



December 20, 2018

VIA ELECTRONIC MAIL ONLY

Austin R. Evers
foia@americanoversight.org

Tracking No: OGE FOIA FY 17/237

Dear Mr. Evers:

This is in response to your Freedom of Information Act (FOIA) request, which was received by the U.S. Office of Government Ethics (OGE) FOIA Office on March 9, 2017. In your request, you asked for:

1. Records containing or reflecting communications between OGE and individuals nominated, or anticipated to be nominated, by President Trump for Senate-confirmed positions in the federal government, including communications with attorneys or agents acting on behalf of such nominees or prospective nominees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such nominees or prospective nominees.
2. Records containing or reflecting communications between OGE and individuals appointed, or anticipated to be appointed, by President Trump for positions in the Executive Office of the President in the White House, including communications with attorneys or agents acting on behalf of such appointees or prospective appointees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such appointees or prospective appointees.

After clarification, you limited this request to exclude nomination notification emails, preclearance notification emails, and report transmittal emails. You also limited the request to a list of certain nominees and appointees.

Because the responsive records are voluminous, we are providing you with rolling responses. As an eleventh and final response to your request, please find 204 pages of responsive documents related to Jared Kushner, Callista Gingrich, Kellyanne Conway, George Perdue, Stephen Miller, Hope Hicks, Stephen Bannon, Robert Lighthizer, Ajit Pai, Gary Cohn, Dina Powell and Reed Cordish subject to deletions made in accordance with FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute; FOIA Exemption 4, 5 U.S.C. § 552(b)(4), as commercial or financial information obtained from a person and privileged or confidential; FOIA Exemption 5, 5 U.S.C. § 552(b)(5), as inter- and intra-agency pre-decisional deliberative process material; and FOIA Exemption 6, 5 U.S.C. § 552(b)(6), as information the disclosure of which would constitute a clearly unwarranted



invasion of personal privacy. The deletions are each marked with a reference “(b)(3),” “(b)(4),” “(b)(5),” or “(b)(6)” in the enclosed copies.

Please note that OGE has searched and has not located any records responsive to James Nicholas Ayers and Sarah Huckabee Sanders. Also, OGE posted records related to Jared Kushner to its [electronic reading room](#). The records are available at the following locations:

- Communications between OGE and representatives for Jared Kushner or Ivanka Trump through January 18, 2017 ([PDF](#))
- Additional communications between OGE and representatives for Jared Kushner through February 1, 2017 ([PDF](#))
- Records related to Jared Kushner and/or Ivanka Trump through August 16, 2017 ([PDF](#))

We are withholding approximately 109 pages in their entirety under FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute, FOIA Exemption 4, 5 U.S.C. § 552(b)(4) as trade secrets and commercial or financial information obtained from a person and privileged or confidential, FOIA Exemption 5, 5 U.S.C. § 552(b)(5) as inter- & intra-agency pre-decisional deliberative process material, and FOIA Exemption 6, 5 U.S.C. § 552(b)(6) as information the disclosure of which would constitute a clearly unwarranted invasion of personal privacy. The withheld pages are attachments to emails provided in the – 204 page release and are identified in that release.

OGE located additional responsive records that originated with the U.S. Department of Agriculture (USDA), Office of the United States Trade Representative (USTR), Federal Communications Commission (FCC), and U.S. Department of State. We are sending these responsive records, along with a copy of your request, to these agencies. The FOIA Requester Service Center phone numbers are, respectively: (202) 720-0944, (202) 395-3419, (202) 418-0440 and (202) 261-8484. We are asking them to review the material and respond directly to you. The referred records are identified in the set of responsive documents provided to you.

Please note there are special access provisions for the following types of records:

- Public financial disclosure reports are not available under the FOIA, pursuant to FOIA Exemption 3, 5 U.S.C. § 552(b)(3) as material specifically exempted from disclosure by another statute. Instead, the Ethics in Government Act (5 U.S.C. app. § 105) and OGE regulations provide for a special access provision for public financial disclosure reports. You may use OGE’s online system to access these reports. Most of the reports you seek (i.e. nominees who occupy positions for which the pay is set at Levels 1 and 2 of the Executive Schedule) are posted on our website [here](#). Any other reports certified by OGE are available [here](#).
- Ethics agreements are available online at the same location as the public financial disclosure reports.

- OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). OGE has created an automated tool to request copies of the CDs, available on OGE's website [here](#).
- 18 U.S.C. § 208 provides for a special access provision for conflict of interest waivers. You may use the fill and print PDF version of the [OGE Form 201](#) to request copies of 18 U.S.C. § 208(b)(1) waivers from the employee's home agency.
- Ethics pledge waivers under Executive Order 13770 are available [here](#).

Because of the special access provisions for obtaining financial disclosure reports, ethics agreements, CDs, and conflict of interest waivers, and ethics pledge waivers, we are not processing these records under the FOIA.

If you have any questions or wish to discuss any aspect of your request, you may contact me by telephone at 202-482-9267. As OGE's FOIA Public Liaison, I am available for assisting in reducing delays, increasing transparency and understanding of the status of requests, and assisting in the resolution of disputes. Additionally, you may contact the Office of Government Information Services (OGIS) at the National Archives and Records Administration to inquire about the FOIA mediation services they offer. The contact information for OGIS is as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

The OGE official responsible for this FOIA determination is the undersigned. In accordance with the FOIA, as codified at 5 U.S.C. § 552(a)(6)(A), and OGE's updated FOIA regulations, at 5 C.F.R. § 2604.304, you may administratively appeal this determination to the Program Counsel, U.S. Office of Government Ethics, 1201 New York Avenue, N.W., Suite 500, Washington, DC 20005-3917. Any such appeal must be in writing and must be sent within 90 days of the date you receive this response letter. If you do appeal, you should include copies of your request and this response, together with a statement of why you believe this initial determination is in error. Also, if you appeal, you should clearly indicate on the envelope and in the letter that it is a "Freedom of Information Act Appeal."

Sincerely,

RACHEL
DOWELL

Digitally signed by
RACHEL DOWELL
Date: 2018.12.20
08:36:24 -05'00'

Rachel K. Dowell
OGE FOIA Officer

Attachment

From: [Monica M. G. Ashar](#)
To: ["Roberts, Blake"](#)
Cc: [Heather A. Jones](#)
Subject: Footnote language
Date: Monday, July 17, 2017 12:40:39 PM

Line 19.3 footnote: Please make the changes below so that the footnote reads as follows:

(b)(3), (5), (6)



Monica Ashar
Assistant Counsel
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005
Phone: (202) 482-9282

From: [Monica M. G. Ashar](#)
To: ["Roberts, Blake"](#)
Subject: RE: Fund name
Date: Monday, July 17, 2017 3:07:17 PM

Thanks, Blake.

From: Roberts, Blake [mailto:Blake.Roberts@wilmerhale.com]
Sent: Monday, July 17, 2017 2:53 PM
To: Monica M. G. Ashar
Cc: Heather A. Jones
Subject: RE: Fund name

(b)(3), (4), (6) . Working on your other questions.

From: Monica M. G. Ashar [mailto:mmgashar@oge.gov]
Sent: Monday, July 17, 2017 12:51 PM
To: Roberts, Blake <Blake.Roberts@wilmerhale.com>
Cc: Heather A. Jones <hajones@oge.gov>
Subject: Fund name

(b)(3), (6)

Monica Ashar
Assistant Counsel
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005
Phone: (202) 482-9282

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, August 18, 2017 4:03 PM
To: Vahab, Lana L
Subject: Your call

Hi Lana,

Thanks for your call.

Now that Ms. Gingrich is done being processed in the nom program, ethics questions are more appropriately directed to your desk officer – could you reach out to your DO with your inquiry?

Thanks!
Kim

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, June 09, 2017 4:22 PM
To: Vahab, Lana L
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks, will be on lookout Monday (just wanted to make sure I knew what was going on because I am about to sign off!)

Have a great weekend!
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, June 09, 2017 4:17 PM
To: Vahab, Lana L
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Who did he send it to? Is it in Integrity?

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, June 09, 2017 9:10 AM
To: Vahab, Lana L
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks for the update. Never a dull moment!

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, June 09, 2017 7:15 AM
To: Vahab, Lana L
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

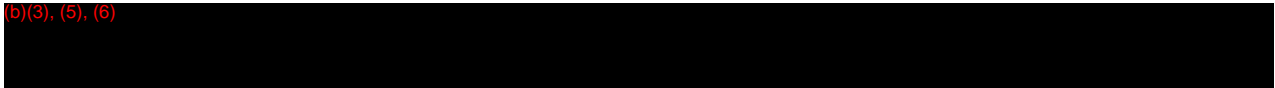
It is hard for me to weigh in on their question without knowing the factual basis behind it. This information is the same that has been on the report since preclearance, so I'm not sure what is prompting this.

Here is the reporting guidance for (b)(3), (6) -

(b)(3), (6)




(b)(3), (5), (6)



Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Thursday, June 08, 2017 11:52 AM
To: Vahab, Lana L
Cc: Bess Kelly
Subject: Re: UPDTAED EA for Preclearance GINGRICH.docx

Hey Lana,

(b)(3), (5), (6)



That's the only feedback our attorney had.

Taylor O. Swindle

Referral to DOS



From: Bess Kelly (b) (6)
Sent: Tuesday, June 06, 2017 2:41 PM
To: Vahab, Lana L; Taylor Swindle
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks Lana!

Callista is out of the country but I am going to try and get a hold of her and will circle around with you on the document and email asap.

-Bess

Referral to DOS



Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Wednesday, April 05, 2017 1:44 PM
To: Vahab, Lana L; Bess Kelly
Subject: RE: Two other things to confirm

Hey Lana,

Bess and I both looked at the questions and can confirm both. Please let us know if you have anything else.

Thank you!

Taylor O. Swindle

Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: THIS IS THE VERSION TO USE
Date: Thursday, April 06, 2017 10:20:33 AM
Attachments: [UPDATED EA for Preclearance GINGRICH.docx](#)

3 page attachment withheld in full - (b)
(3), (4), (5), (6)

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 31, 2017 12:45 PM
To: Vahab, Lana L
Subject: RE: Talked to post in Holy See

I am free until around 3:30 today. What works for you?

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 31, 2017 12:04 PM
To: Vahab, Lana L
Subject: RE: Talked to post in Holy See

Want to talk about (b)(3), (b) stuff. Are you available in ~15 mins?

Referral to DOS



Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Monday, June 12, 2017 8:34 AM
To: Martin, Janice N; Nominees
Cc: Vahab, Lana L
Subject: RE: State Department

Lana,

As you may recall, Heather returned the report in Integrity to David to allow yall to make the necessary changes. I don't see where he has re-submitted the report in Integrity, which I think needs to be done at this point.

Thanks,
Kim


Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: Some (hopefully) last clarifying questions from OGE
Date: Wednesday, March 29, 2017 3:29:20 PM

Thanks, pls. let me know when you've made appropriate adjustments to the report and I can review again.

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Wednesday, March 29, 2017 10:40 AM
To: Vahab, Lana L
Subject: RE: Some (hopefully) last clarifying questions from OGE

Hey Lana!

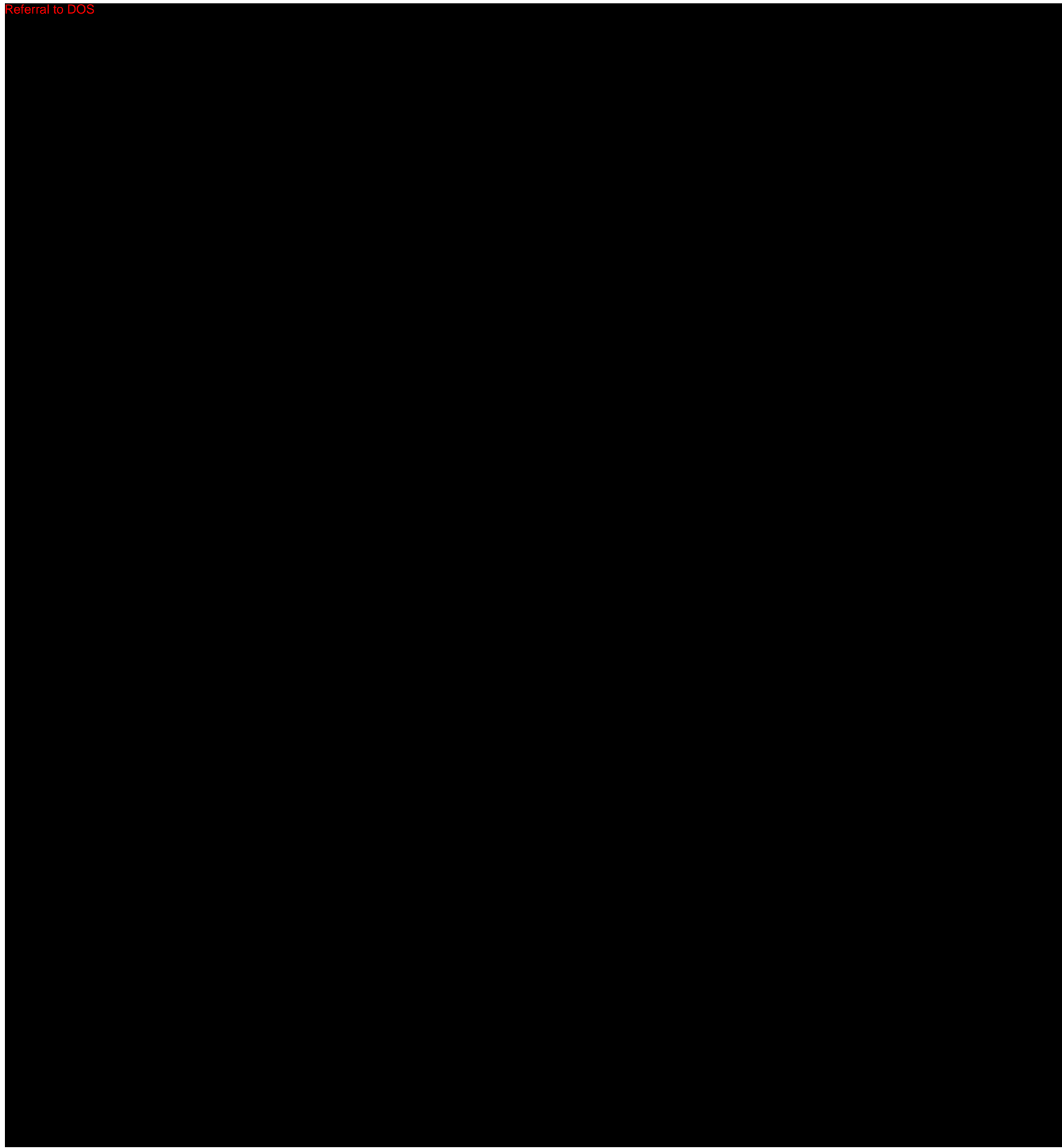
See answers below. Let me know if I need to clarify anything further. It gets kind of confusing...

Taylor O. Swindle

Referral to DOS



Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]

Sent: Wednesday, March 29, 2017 4:02 PM

To: Vahab, Lana L

Subject: RE: Reporting income from (b)(3), (6)

Thanks. Do you have a second to discuss the status of the answers, report, etc.?

Referral to DOS



From: Taylor Swindle (b) (6)

Sent: Wednesday, March 29, 2017 3:38 PM

To: Vahab, Lana L

Subject: RE: Reporting income from (b)(3), (6)

Hey Lana,

That's correct. Ms. Gingrich only receives (b)(3), (6).

Thanks!

Taylor O. Swindle

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, March 28, 2017 11:54 AM

To: Vahab, Lana L

Subject: RE: Reporting income from (b)(3), (6)

Hi Lana,

Thanks for all of the updates. A few comments/questions:

(b)(3), (5), (6)

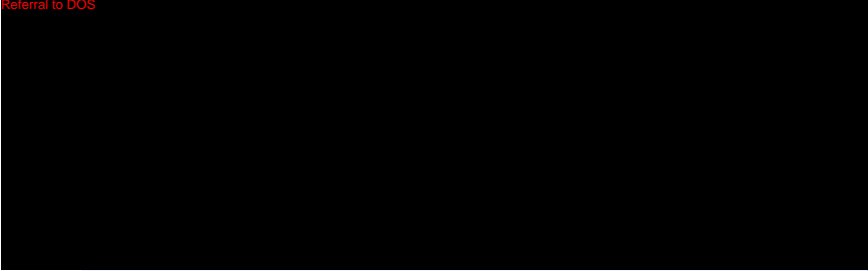
(b) (5)



Thanks for your continued assistance.

Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, March 28, 2017 8:44 AM

To: Vahab, Lana L

Subject: RE: Reporting income from (b)(3), (6)

Lana,

Monica said she wasn't able to connect with you yesterday. Re your question, I think reporting can be done as such:

(b)(3), (6)

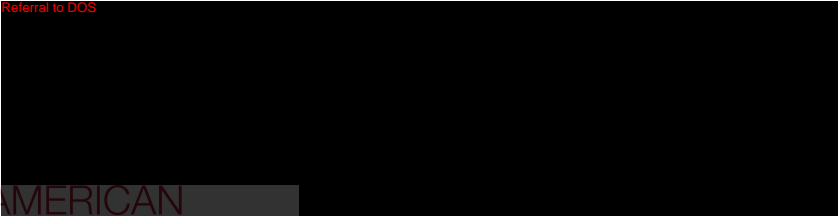


Kim

Referral to DOS



Referral to DOS



Referral to DOS

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 24, 2017 3:02 PM
To: Vahab, Lana L
Subject: reporting

Hi Lana,


(b)(3), (6)



Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, March 17, 2017 3:21 PM
To: Vahab, Lana L
Subject: RE: Report

Hi Lana,

Could we chat at 10am?

Thanks

Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, March 17, 2017 3:15 PM
To: Vahab, Lana L
Subject: RE: Report

Lana,

I'm not available for the rest of the day. Could we set a time Monday?

Thanks

Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, March 17, 2017 2:20 PM
To: Vahab, Lana L
Subject: RE: Report

In fact, I just got pulled away. Not sure when I'll free up and I'm unavailable after 3:30. Will follow up with you when I'm free

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, March 17, 2017 12:17 PM
To: Vahab, Lana L
Subject: Report

Hi Lana,

I wanted to check to see if you had a couple of minutes to discuss the Gingrich report/conflicts analysis. My afternoon looks like it might be getting jammed up with meetings, so I thought I'd seize the moment to see if we could speak now-ish.

Thanks!

Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Teresa L. Williamson](#)
To: [Kimberly L. Sikora Panza](#); [Vahab, Lana L](#); "[Martin, Janice N](#)"
Subject: Public Financial Disclosure Report of Callista L. Gingrich
Date: Wednesday, June 14, 2017 9:42:15 AM
Attachments: [Gingrich, Callista L. final278.pdf](#)
[Gingrich, Callista L. finalsenateltr.pdf](#)
[Gingrich, Callista L. finalEA.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Morning,

I've attached the financial disclosure package Callista L. Gingrich, who has been nominated by President Trump for the position of United States Ambassador to the Holy See, Department of State.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

From: [Kimberly L. Sikora Panza](#)
To: [Stefan Passantino](#) (b) (6)
Cc: [Ann Donaldson](#) (b) (6); [James D. Schultz](#) (b) (6)
Subject: RE: Precleared: Callista Gingrich
Date: Friday, April 07, 2017 6:11:48 PM
Attachments: [EA for Preclearance GINGRICH.docx](#) 3 page attachment withheld in full - (b)(3), (4), (5), (6)

Good evening,

Attached please find the ethics agreement for Callista Gingrich.

Best regards,
Kim

From: Heather A. Jones
Sent: Friday, April 07, 2017 5:18 PM
To: Stefan Passantino (b) (6)
Cc: Kimberly L. Sikora Panza; 'Vahab, Lana L'; Martin, Janice N; Mr. David P. Huitema (b) (6); Ann Donaldson (b) (6); David J. Apol; Deborah J. Bortot; Heather A. Jones; James D. Schultz (b) (6); Rodrick T. Johnson; Sandra S. Mabry; Teresa L. Williamson
Subject: Precleared: Callista Gingrich

Stefan-

Callista Gingrich is precleared. Kim, please forward the ethics agreement to the White House.

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: Not to rush you at all
Date: Friday, April 07, 2017 2:05:12 PM

Fantastic - let's get this done! 😊

Referral to DOS



From: Bess Kelly (b) (6)
Sent: Friday, April 07, 2017 1:07 PM
To: Vahab, Lana L; Taylor Swindle
Subject: RE: Not to rush you at all

Hey Lana-
Our goal is to get this back to you asap today!

Bess

Referral to DOS



Referral to DOS



From: Heather A. Jones [mailto:hajones@oge.gov]
Sent: Thursday, July 13, 2017 11:28 AM
To: Vahab, Lana L; Kimberly L. Sikora Panza
Cc: Huitema, David P
Subject: RE: (b)(3), (b)

Given these facts, I spoke with Dave and we not requirement an amendment and will add this information to our notes.

Thanks,
Heather

Referral to DOS





From: [Teresa L. Williamson](#)
To: [Monica M. G. Ashar](#); [Emory A. Rounds III](#); [Kimberly L. Sikora Panza](#); [Elaine Newton](#); [Lorna A. Syme](#); [Kimberley H. Kaplan](#); [Wendy G. Pond](#); [Keith Labedz](#); [Christopher J. Swartz](#)
Cc: [LEGTEAM](#); [Megan V. Granahan](#); [Stephanie Nonluecha](#); [Heather A. Jones](#); [Steven Corbally](#); [Sandra S. Mabry](#); [Leigh J. Francis](#); [Vincent Salamone](#); [Grace A. Clark](#); [Jim Robertson](#); [Rachel K. Dowell](#); [Brandon L. Bunderson](#); [Cheryl L. Kane-Piasecki](#); [Deborah J. Bortot](#); [Jack MacDonald](#); [Dale A. Christopher](#); [Nicole Stein](#); [Daniel L. Skalla](#); [Diana Veilleux](#); [Patrick J. Lightfoot](#); [Elizabeth D. Horton](#); [Seth Jaffe](#); [David A. Meyers](#); [Ciara M. Guzman](#); [Patrick Shepherd](#); [Rodrick T. Johnson](#); [Jaideep Mathai](#)
Subject: NEW NOMINATION - May 25, 2017
Date: Friday, May 26, 2017 8:14:56 AM

The following nomination has been posted on THOMAS. Please contact the agency if you do not have the final package.

Please remember to add the applicable Senate Transmittal Letter Template to FDTS before forwarding. Thanks!!

NOMINATION - OGE Reviewer: Monica (*INTEGRITY*)

[PN524](#) — 115th Congress (2017-2018) — George Nesterczuk — Office of Personnel Management

George Nesterczuk, of Virginia, to be Director of the Office of Personnel Management for a term of four years, vice Katherine Archuleta, resigned.

Date Received from President: 05/25/2017

Committee: Homeland Security and Governmental Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Homeland Security and Governmental Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Sikora Panza (*INTEGRITY*)

[PN523](#) — 115th Congress (2017-2018) — Callista L. Gingrich — Department of State

Callista L. Gingrich, of Virginia, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Holy See.

Date Received from President: 05/25/2017

Committee: Foreign Relations

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (*INTEGRITY*)

[PN521](#) — 115th Congress (2017-2018) — Heather L. MacDougall — Occupational Safety and Health Review Commission

Heather L. MacDougall, of Florida, to be a Member of the Occupational Safety and Health Review Commission for a term expiring April 27, 2023. (Reappointment)

Date Received from President: 05/25/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - OGE Reviewer: Keith (*INTEGRITY*)

[PN520](#) — 115th Congress (2017-2018) — Brett Giroir — Department of Health and Human Services

Brett Giroir, of Texas, to be Medical Director in the Regular Corps of the Public Health Service, subject to the qualifications therefor as provided by law and regulations, and to be an Assistant Secretary of Health and Human Services, vice Howard K. Koh, resigned.

Date Received from President: 05/25/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - OGE Reviewer: Keith (*INTEGRITY*)

[PN519](#) — 115th Congress (2017-2018) — Michael Arthur Raynor — Department of State

Michael Arthur Raynor, of Maryland, a Career Member of the Senior Foreign Service, Class of Minister-Counselor, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the Federal Democratic Republic of Ethiopia.

Date Received from President: 05/25/2017

Committee: Foreign Relations

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Wendy (*INTEGRITY*)

[PN518](#) — 115th Congress (2017-2018) — Gilbert B. Kaplan — Department of Commerce

Gilbert B. Kaplan, of the District of Columbia, to be Under Secretary of Commerce for International Trade, vice Stefan M. Selig, resigned.

Date Received from President: 05/25/2017

Committee: Finance

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Sikora Panza (*INTEGRITY*)

[PN517](#) — 115th Congress (2017-2018) — David S. Jonas — Department of Energy

David S. Jonas, of Virginia, to be General Counsel of the Department of Energy, vice Steven Croley, resigned.

Date Received from President: 05/25/2017

Committee: Energy and Natural Resources

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. ([All Actions](#))

NOMINATION - OGE Reviewer: Keith (*INTEGRITY*)

[PN516](#) — 115th Congress (2017-2018) — Karen Dunn Kelley — Department of Commerce

Karen Dunn Kelley, of Pennsylvania, to be Under Secretary of Commerce for Economic Affairs, vice Mark Doms, resigned.

Date Received from President: 05/25/2017

Committee: Commerce, Science, and Transportation

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Emory (*INTEGRITY*)

[PN515](#) — 115th Congress (2017-2018) — Neal J. Rackleff — Department of Housing and Urban Development

Neal J. Rackleff, of Texas, to be an Assistant Secretary of the Department of Housing and Urban Development, vice Mercedes Marquez.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Elaine (*INTEGRITY*)

[PN514](#) — 115th Congress (2017-2018) — J. Paul Compton Jr. — Department of Housing and Urban Development

J. Paul Compton, Jr., of Alabama, to be General Counsel of the Department of Housing and Urban Development, vice Helen R. Kanovsky, resigned.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Kaplan (*INTEGRITY*)

[PN513](#) — 115th Congress (2017-2018) — Richard Ashooh — Department of Commerce

Richard Ashooh, of New Hampshire, to be an Assistant Secretary of Commerce, vice Kevin Wolf, resigned.

Date Received from President: 05/25/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 05/25/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Chris (*INTEGRITY*)

[PN512](#) — 115th Congress (2017-2018) — Robert R. Hood — Department of Defense

Robert R. Hood, of Georgia, to be an Assistant Secretary of Defense, vice Stephen C. Hedger.

Date Received from President: 05/25/2017

Committee: (See [S. Res. 116 - 112th Congress](#))

Latest Action: 05/25/2017 - Placed on Senate Executive Calendar in the Privileged Nomination section with nominee information requested by the Committee on Armed Services, pursuant to S.Res. 116, 112th Congress. ([All Actions](#))

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: (b)(3), (6)
Date: Thursday, March 30, 2017 10:18:14 AM

Hi Lana,

(b)(3), (5), (6)



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Friday, April 07, 2017 11:36 AM
To: Vahab, Lana L
Subject: Integrity Q

Lana,

Alas, we are correct – there is no way to re-order entries. (We are aware of the interest in that functionality as an enhancement, however, I believe funding also comes into play with things like that/whether we can implement)

On a separate note re this nom, what is the status of the EA – has the filer reviewed?

Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

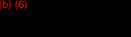
Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Tuesday, July 25, 2017 12:25 PM
To: Vahab, Lana L
Subject: RE: I know you are crazy busy

Hi Lana,

Hope you're well.

I'm already totally jammed today, and tomorrow isn't great either because I'm only here a half day bc of ^{(b) (6)}  Could we perhaps chat on Thursday? If there are specific questions you had that you wanted to share ahead of time, feel free to shoot them to me over email in advance (offering that from an efficiency perspective, in case you have questions about something I don't immediately know off the top of my head!)

Kim

Referral to DOS



AMERICAN
OVERSIGHT

05-N-000033

Referral to DOS



From: [Monica M. G. Ashar](#)
To: [Kimberly L. Sikora Panza](#)
Subject: RE: heads up
Date: Friday, August 18, 2017 5:30:51 PM

Thanks!

From: Kimberly L. Sikora Panza
Sent: Friday, August 18, 2017 4:03 PM
To: Monica M. G. Ashar
Subject: heads up

Lana's had some follow up ethics question re (b) (5) (I handled some a couple of weeks ago and she just left me a VM w another). I conferred with Heather and she agreed that now that Gingrich is out of the nom program, the questions are more appropriately desk officer questions - so I reached out to Lana and told her to reach out for DO support.

Didn't want this to come as a surprise to you, so wanted to give you the heads up!

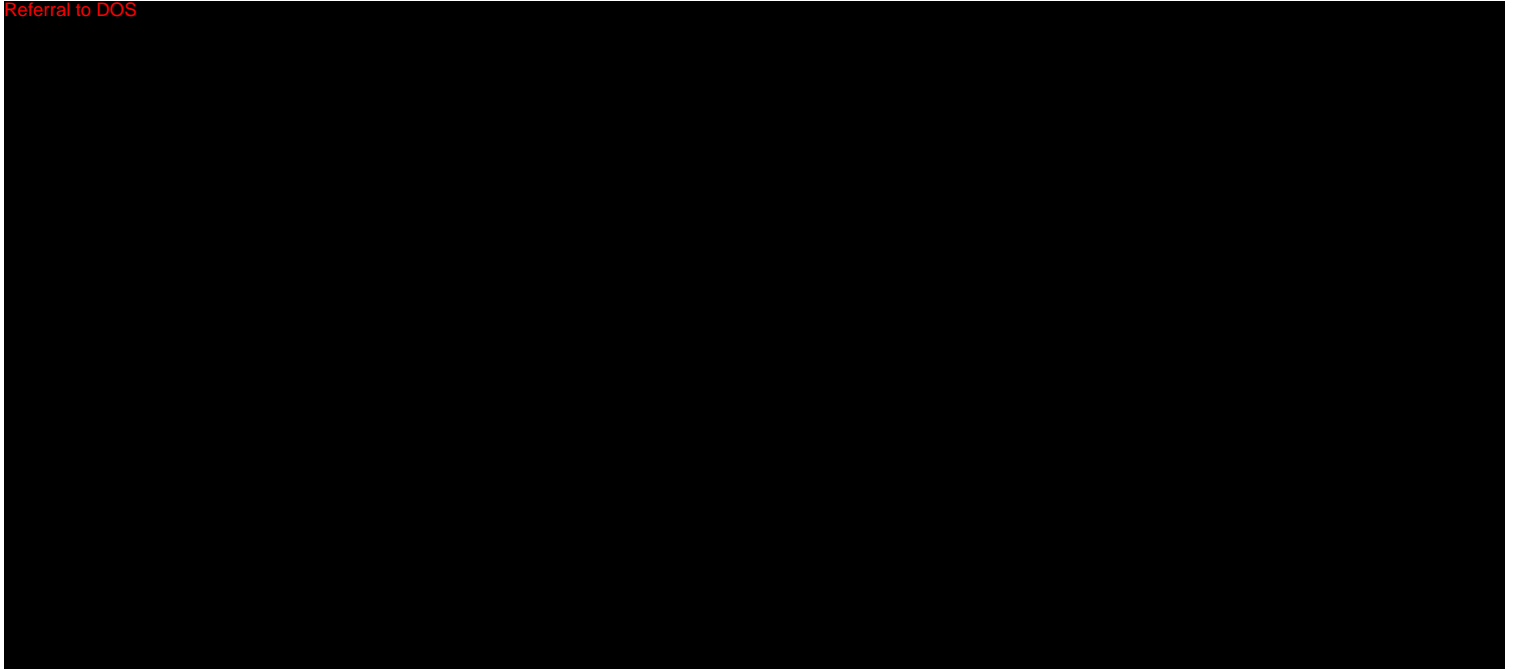
Thanks,
Kim

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Cc: [Monica M. G. Ashar](#)
Subject: RE: Got your V/m on Gingrich
Date: Monday, June 05, 2017 9:45:57 AM

So sorry to hear, Lana! I hope you are well now....I am out today but will check my email again this afternoon.

Kim

Referral to DOS



Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: [Heather A. Jones](#); [Deborah J. Bortot](#); [David J. Apol](#)
Subject: Gingrich status email
Date: Thursday, June 08, 2017 11:00:34 AM

FYI, this is the email that I got re Gingrich. Apparently she returns tonight and her people will print the docs for her to review Friday a.m. (see below)

Referral to DOS



From: Bess Kelly (b) (6)
Sent: Wednesday, June 07, 2017 6:05 PM
To: Vahab, Lana L
Cc: Taylor Swindle
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Hi Lana-

Newt and Callista have been on the road in and Callista has not had a chance to get to a computer to read through everything again.

They return tomorrow night and I plan to print all the documents for her review on Friday morning and will get them back to you (and an email as well) ASAP!

Sorry for the delay!

-Bess

Referral to DOS



N

From: Bess Kelly (b) (6)

Sent: Tuesday, June 06, 2017 2:41 PM
To: Vahab, Lana L; Taylor Swindle
Subject: RE: UPDTAED EA for Preclearance GINGRICH.docx

Thanks Lana!

Callista is out of the country but I am going to try and get a hold of her and will circle around with you on the document and email asap.

-Bess

Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: Gingrich report done being edited
Date: Friday, April 07, 2017 3:59:25 PM

Great, thanks.

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, April 07, 2017 3:52 PM
To: Vahab, Lana L
Subject: RE: Gingrich report done being edited

Lana,

I don't need it right this second, but can you have the filer send back an email to you confirming the statements in that "confirmatory email" I sent?

Thanks,
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, April 07, 2017 3:17 PM
To: Vahab, Lana L
Subject: RE: Gingrich report done being edited

We don't need signed EA right now, just to know that everyone is good with it. (We don't ask to get

EA signatures until after nomination)

Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L"](#)
Subject: RE: Gingrich nomination
Date: Wednesday, May 31, 2017 4:10:06 PM

I definitely assumed so, but wanted to make it explicit! ☺

Referral to DOS

A large black rectangular redaction box covering the body of the email.

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Wednesday, May 31, 2017 4:06 PM
To: Vahab, Lana L
Subject: RE: Gingrich nomination

I neglected to ask – please confirm that these interests are not problematic from a conflicts perspective.

From: Kimberly L. Sikora Panza
Sent: Wednesday, May 31, 2017 3:32 PM
To: 'Vahab, Lana L'
Subject: RE: Gingrich nomination

Hi Lana,

Thanks for the additional information. Just to make sure we have everything straight, can you please:

(b)(3), (5), (6)

A large black rectangular redaction box covering the body of the email.

(b)(3), (5), (6)



Thanks,
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Wednesday, May 31, 2017 10:36 AM
To: Vahab, Lana L
Subject: RE: Gingrich nomination
Lana,

(b)(3), (5), (6)



Keep me posted on the other details,
Kim

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Wednesday, May 31, 2017 9:50 AM

To: Vahab, Lana L

Subject: RE: Gingrich nomination

Hi Lana,

First, please note that Heather just returned the report to David in Integrity, for any changes that need to be made.

Second, in addition to my question below (and the details you've flagged as ones you're collecting), I wanted to confirm:

(b) (5)



Thanks,

Kim

From: Kimberly L. Sikora Panza

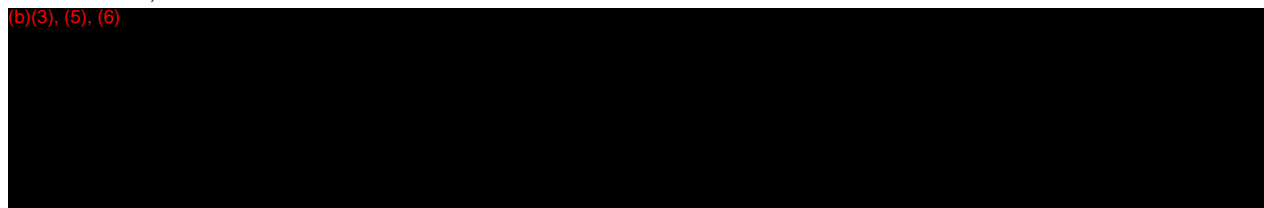
Sent: Tuesday, May 30, 2017 3:37 PM

To: 'Vahab, Lana L'

Subject: RE: Gingrich nomination

Thanks,

(b)(3), (5), (6)



Kim

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, May 30, 2017 3:00 PM

To: Vahab, Lana L

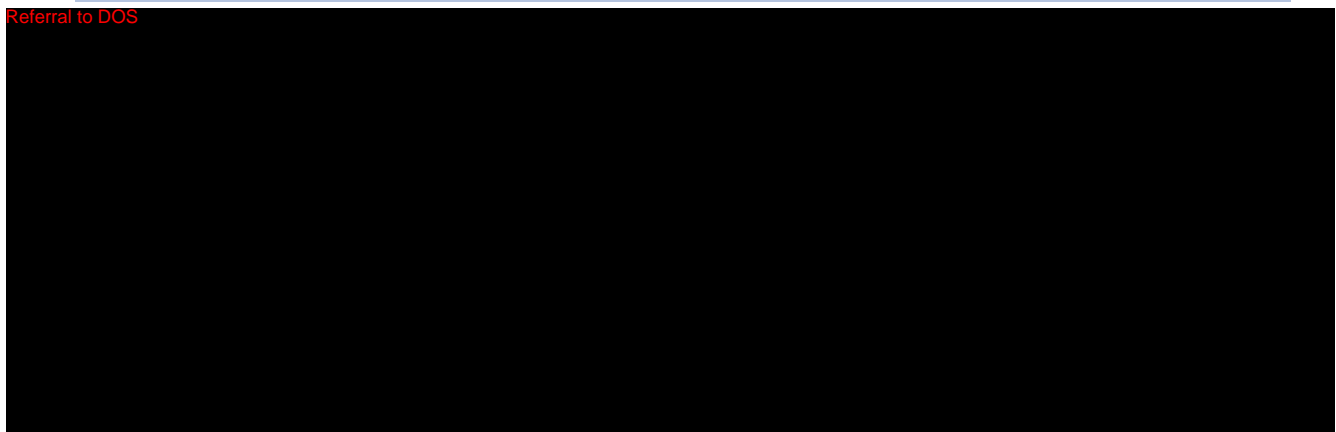
Subject: RE: Gingrich nomination

We'll need to get that on the report. (b) (5)



I am in a meeting starting now, I will try to call you after but the rest of my afternoon is jammed up.

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, May 30, 2017 12:32 PM

To: Vahab, Lana L

Subject: RE: Gingrich nomination

I've pulled the folder back and it is now sitting on my desk. Please let me know as soon as you get details re what is going on/missing.

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, May 30, 2017 9:01 AM

To: Vahab, Lana L

Subject: RE: Gingrich nomination

Hi Lana,

I hope you had a nice holiday weekend!

I see the Gingrich report has been certified by David in Integrity, so I believe all we need at this point is the agency transmittal letter.

Thanks again for all of your help on this report!

Kim

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Friday, May 26, 2017 8:36 AM

To: Vahab, Lana L

Subject: Gingrich nomination

Good morning, Lana,

As you may already know, Callista Gingrich has been nominated. At this time, we'll need her final documents.

You have already provided me a signed copy of her ethics agreement. Can you please have her sign the 278? Your agency also will need to certify the report. Once that is done, please send me the transmittal letter.

Thank you in advance for your assistance.

Kim

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI)

From: [EA Compliance](#)
To: "Martin, Janice N"
Cc: [EA Compliance](#)
Subject: GINGRICH EA - 90 Day Reminder - EA Certification Attached
Date: Wednesday, October 18, 2017 4:05:03 PM
Attachments: [EA Certification \(June 2017 version\) - Ambassador Gingrich - STATE.pdf](#)

EA certification available at [https://extapps2.oge.gov/2017/Presiden.nsf/580BB171E3B78C9F852581DF003195D0/\\$FILE/Gingrich,%20EA%20Certification%201%20of%201.pdf](https://extapps2.oge.gov/2017/Presiden.nsf/580BB171E3B78C9F852581DF003195D0/$FILE/Gingrich,%20EA%20Certification%201%20of%201.pdf)

Dear Ms. Martin:

Ms. Callista L. Gingrich was confirmed as Ambassador to the Holy See on October 16, 2017. This is a reminder that Ambassador Gingrich has 90 days from the date of confirmation (October 16, 2017) to comply with the terms of her ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via ecompliance@oge.gov as soon as possible if an extension will be requested.

Ambassador Gingrich is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). Ambassador Gingrich should provide the completed and signed Certification to ethics officials as soon as possible but not later than January 16, 2018. The Certification should then be submitted to OGE no later than January 23, 2018, via email to ecompliance@oge.gov.

Thank you for your assistance in this matter, and please contact ecompliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise ecompliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Thursday, April 06, 2017 2:46 PM
To: Vahab, Lana L.
Subject: RE: Gingrich

The system is beating us! ☺

Sounds like the system correctly is saying (b)(3), (b)(7)

Since this is the (b)(3), (b)(7) Does that work?

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Thursday, April 06, 2017 2:34 PM
To: Vahab, Lana L.
Subject: RE: Gingrich

That works

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Thursday, April 06, 2017 2:21 PM
To: Vahab, Lana L.
Subject: RE: Gingrich

Lana,

(b)(3), (b)(7)



Thanks,
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Wednesday, April 05, 2017 1:13 PM
To: Vahab, Lana L
Subject: RE: Gingrich

Hi Lana,

I think we're pretty darn close to the finish line!!

3 page attachment withheld in full - (b) (3), (4), (5), (6)

A few things:

(b)(3), (5), (6)

Please let me know if you have any questions or would like to discuss. Looking forward to getting this across the finish line!

Thanks,
Kim

Referral to DOS

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Tuesday, April 04, 2017 3:31 PM
To: Vahab, Lana L
Subject: RE: Gingrich

Thanks

Referral to DOS

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Tuesday, April 04, 2017 8:27 AM
To: Vahab, Lana L
Subject: RE: Gingrich

Hi Lana,

A couple of things:

(b)(3), (6)

(b)(3), (5), (6)



Thanks,
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Monday, April 03, 2017 1:31 PM
To: Vahab, Lana L
Subject: Gingrich

Hi Lana,

I hope you had a nice weekend! Just wanted to touch base re the Gingrich report...

(b)(3), (5), (6)



Thanks,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: Gingrich
Date: Friday, June 02, 2017 9:37:14 AM
Attachments: [UPDTAED EA for Preclearance GINGRICH.docx](#)

4 page attachment withheld in full - (b) (3), (4), (5), (6)

Hi Lana,

I've reviewed the report and it looks like we still need various changes that I requested earlier; specifically

(b)(3), (5), (6)



Kim

Referral to DOS



From: [Monica M. G. Ashar](#)
To: [Kimberly L. Sikora Panza](#)
Subject: RE: FYI
Date: Monday, June 05, 2017 10:03:42 AM

Thanks, Kim.

From: Kimberly L. Sikora Panza
Sent: Monday, June 05, 2017 9:53 AM
To: Monica M. G. Ashar
Subject: FYI

I'll check back in this afternoon to see where things stand on Gingrich and respond to any questions Lana has (so at most if it gets buttoned up, hopefully the most you'll ever have to do is print something)

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L"](#)
Subject: RE: follow up from our call yesterday
Date: Thursday, March 30, 2017 2:09:17 PM

"Nothing's easy" seems to be my motto for everything lately, I feel your pain!

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Thursday, March 30, 2017 1:30 PM
To: Vahab, Lana L
Subject: RE: follow up from our call yesterday

Thanks for the additional information. I need to review and digest all of this stuff; on the technical reporting front for the (b) (3), please let me know when you've made the reporting adjustments for the (b) (3) that we discussed.

Thanks!
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Thursday, March 30, 2017 8:15 AM
To: Vahab, Lana L
Subject: RE: follow up from our call yesterday

Hi Lana,

(b)(3), (5), (6)



Thank you,

Lana

Referral to DOS

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: (b)(3), (b)(6) Follow up
Date: Thursday, March 30, 2017 11:48:46 AM

Sure, thanks. I think, based on that, it wouldn't need to be on the form. I'm going to put that in my notes though, and when I have future discussions on big picture report stuff, etc. with Heather/Deb I will flag that.

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Thursday, March 30, 2017 11:37 AM
To: Vahab, Lana L
Subject: RE: (b)(3), (b)(6) Follow up

(b) (5)



Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: (b)(3), (6)
Date: Thursday, June 01, 2017 2:21:49 PM

Thanks, Lana. Sounds like we can hopefully get all of the details today and (fingers crossed) get this re-finalized and out the door tomorrow? Let's see how it goes!

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Thursday, June 01, 2017 12:18 PM
To: Vahab, Lana L
Subject: RE: (b)(3), (6)

(b)(3), (5), (6)



Taylor O. Swindle

Referral to DOS



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Thursday, June 01, 2017 10:38 AM

To: Vahab, Lana L

Subject: RE: (b)(3), (6)

Lana,

(b)(3), (6)

Thanks,

Kim

Referral to DOS

From: Taylor Swindle (b) (6)

Sent: Thursday, June 01, 2017 9:56 AM

To: Vahab, Lana L

Cc: Bess Kelly

Subject: FW: (b)(3), (6)

Lana,

Re Kim's question, see below on what I asked Bob Okun regarding these (b)(3), (6) I'm not an attorney so I'm confused... (b)(3), (5), (6)

Very confused....Happy to send over the agreement for you to take a look at as well.

Taylor O. Swindle

From: (b)(6) - Bob Okun's email address

Sent: Thursday, June 1, 2017 9:25 AM

To: Taylor Swindle (b) (6) >

Cc: Bess Kelly <(b) (6)>

Subject: RE: (b)(3), (6)

They are (b)(3), (4), (6)

.....OK?

On May 30, 2017, at 12:27 PM, Taylor Swindle (b) (6) wrote:

Hi Bob,

Hope you're well today. (b)(3), (5), (6)

I was hoping you could send me any and all detail you have on this matter as soon as possible.

Thanks so much!

Taylor O. Swindle

No attachment found in search

(b)(3), (6).pdf>

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: Emailing: Sample 278e amendment.docx
Date: Wednesday, July 12, 2017 1:20:00 PM
Attachments: [Sample 278e amendment.docx](#)

1 page attachment withheld in full - (b)
(5)

Hi Lana,

Attached is the sample amendment letter.

(b)(3), (5), (6)

Thanks
Kim

Your message is ready to be sent with the following file or link attachments:

Sample 278e amendment.docx

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

From: Vahab, Lana L
To: [Kimberly L. Sikora Panza](#)
Subject: EA for Preclearance GINGRICH with DH edits.docx
Date: Wednesday, April 05, 2017 2:13:09 PM
Attachments: [EA for Preclearance GINGRICH with DH edits.docx](#)

3 page attachment withhelds in full - (b)(3), (4), (5), (6)

Kim - Please see our edits in track changes. Let me know if you want to discuss.

Best,

Lana

This email is UNCLASSIFIED.

From: Vahab, Lana L
To: [Kimberly L. Sikora Panza](#)
Subject: Draft EA Gingrich.docx
Date: Monday, April 03, 2017 2:34:11 PM
Attachments: [Draft EA Gingrich.docx](#)

5 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi Kim,

I have not had it reviewed internally yet, but here is what I have so far. Still waiting to hear (b)(3), (6)

Lana

This email is UNCLASSIFIED.

From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: Confirmatory email
Date: Thursday, April 06, 2017 2:36:32 PM

Hi Lana,

OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct the nominee to personally review the report carefully once more**, given that the nominee will be personally responsible for all entries in the report as they currently appear.

Before OGE reviews this report for "preclearance," I'm sending you a list of some of the nominee's material representations on which we are relying. Please forward this message to the nominee and ask her to confirm the information below (and please notify us immediately if any item in this list is incorrect).

Among other material representations, we are relying on the following:

- The nominee has personally reviewed all entries in the current version of the report and has affirmed that they are correct.
- (b)(3), (d)
- For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, **2015**, to present.
- For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, **2016**, to present.
- (b)(3), (d)
- The ethics agreement correctly describes all items addressed in the agreement.

Thanks,
Kim

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Monday, March 20, 2017 4:37 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

Lana,

(b)(3), (5), (6)



Kim

Referral to DOS



From: Taylor Swindle (b)(6)
Sent: Monday, March 20, 2017 4:13 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

(b)(3), (5), (6)



Taylor O. Swindle

Referral to DOS



From: Taylor Swindle (b)(6)

Sent: Monday, March 20, 2017 3:59 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

Hey Lana,

(b)(3), (5), (6)



Wish I had a better answer for you there.

Taylor O. Swindle

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Monday, March 20, 2017 12:33 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

Hey Lana,

(b)(3), (5), (6)



Hope that helps. Let me know if you need other info.

Thanks!

Taylor O. Swindle

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Friday, March 17, 2017 4:34 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

Hi Lana,

Please see below for requested info. Please let me know if this is about what you need.

Have a great weekend!

Taylor O. Swindle

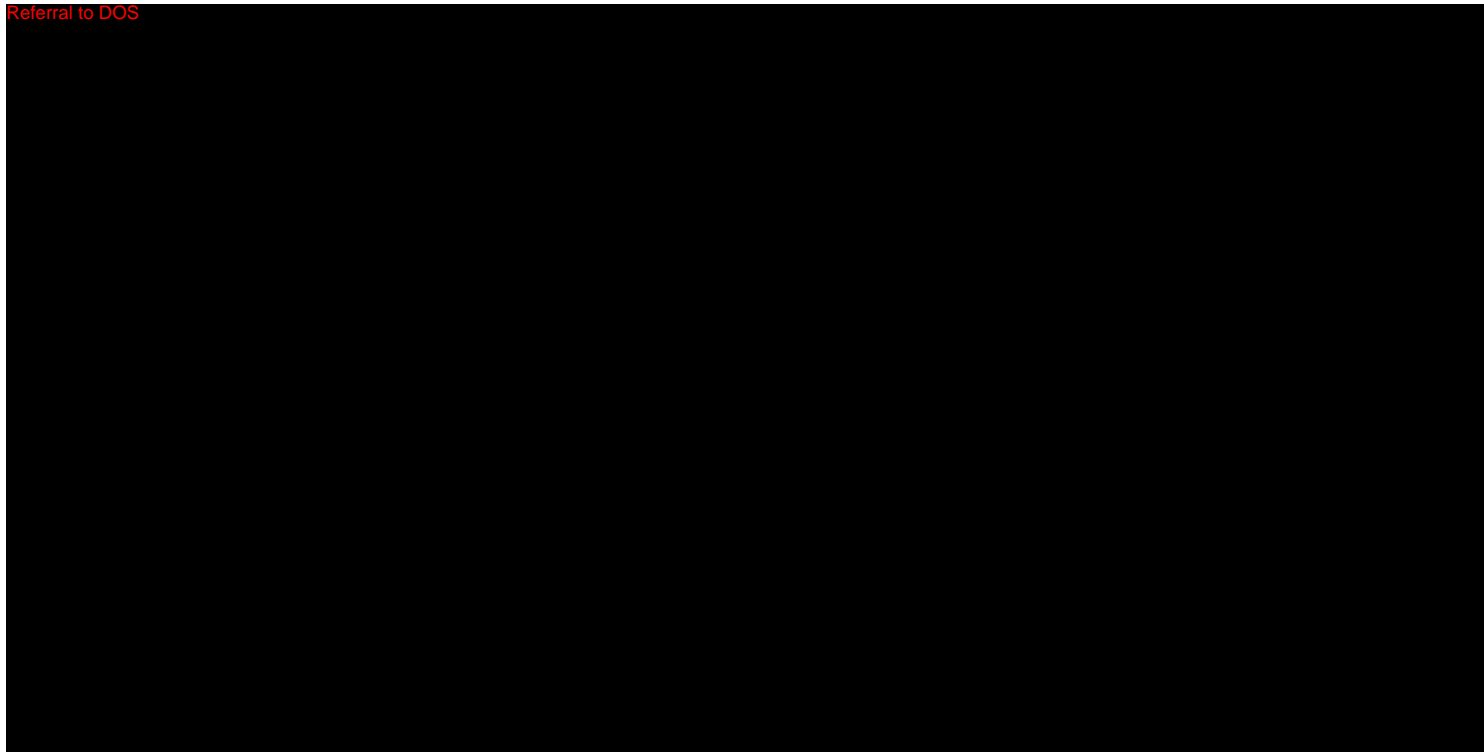
(b)(3), (4), (5), (6)



Referral to DOS



Referral to DOS



This email is UNCLASSIFIED.

From: Taylor Swindle (b) (6)]
Sent: Friday, March 10, 2017 2:05 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

Yes ma'am!

Taylor O. Swindle

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Friday, March 10, 2017 2:01 PM
To: Vahab, Lana L
Subject: RE: Ambassadorial Candidacy Preclearance Process

(b)(3), (5), (6)



(b)(3), (4), (6)



From: Vahab, Lana L. (b) (6)
Sent: Friday, March 10, 2017 1:35 PM
To: Taylor Swindle (b) (6) >
Subject: RE: Ambassadorial Candidacy Preclearance Process

Hi Taylor,

(b)(3), (5), (6)



Happy to discuss.

Best,

Lana

Privacy/PII

This email is UNCLASSIFIED.

From: Taylor Swindle (b) (6)

Sent: Friday, March 10, 2017 1:22 PM
To: Vahab, Lana L
Cc: Bess Kelly
Subject: RE: Ambassadorial Candidacy Preclearance Process

Hi Lana,

(b)(3), (4), (5), (6)



Hope that helps!

Taylor O. Swindle

Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Friday, March 10, 2017 10:06 AM
To: Vahab, Lana L; Bess Kelly
Subject: RE: Ambassadorial Candidacy Preclearance Process

Good Morning Lana!

(b)(3), (4), (5), (6)



Thank you!

Taylor O. Swindle

Referral to DOS



From: Bess Kelly (b) (6)
Sent: Wednesday, March 08, 2017 6:45 PM
To: Vahab, Lana L
Cc: Taylor Swindle
Subject: RE: Ambassadorial Candidacy Preclearance Process

Lana-

Thank you so much for your time today. I wanted to connect you with Taylor Swindle on our team (cc'd above).

Thank you again,

Bess

Referral to DOS



Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Wednesday, June 07, 2017 3:21 PM
To: Vahab, Lana L
Subject: RE: All info updated

Zoinks – OK, thanks. I'll let my team know.

Referral to DOS



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]
Sent: Wednesday, June 07, 2017 3:10 PM
To: Vahab, Lana L
Subject: RE: All info updated

Hi Lana,

Just wanted to touch base to see when we can expect the Gingrich finals – want to get this out the door as soon as we can!

Thanks,
Kim

Referral to DOS



From: [Kimberly L. Sikora Panza](#)
To: ["Vahab, Lana L."](#)
Subject: RE: Additional Questions from OGE
Date: Thursday, June 01, 2017 9:24:39 AM

[Re this](#)

(b)(3), (5), (6)



Referral to DOS



From: Taylor Swindle (b) (6)
Sent: Thursday, June 01, 2017 9:07 AM
To: Vahab, Lana L; Bess Kelly
Subject: RE: Additional Questions from OGE

Hey Lana,

See below. As we discussed last night, we believe it's best if we included (b)(3), (6)

Let us know if you have any other questions.

Thank you!

Taylor O. Swindle

Referral to DOS



Referral to DOS

Referral to DOS



UNITED STATES OFFICE OF
GOVERNMENT ETHICS



June 13, 2017

The Honorable Bob Corker
Chairman
Committee on Foreign Relations
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Callista L. Gingrich, who has been nominated by President Trump for the position of United States Ambassador to the Holy See, Department of State.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

DAVID APOL

Digitally signed by DAVID APOL
DN c=US, o=U.S. Government, ou=Office of
Government Ethics, cn=DAVID APOL,
0.9.2342.19200300.100.1.1=95491002981870
Date 2017.06.13 18 19 32 -04'00'

David J. Apol
General Counsel

Enclosures



June 9, 2017

Ms. Katherine D. McManus
Deputy Legal Adviser and
Designated Agency Ethics Official
Office of the Legal Adviser
Department of State

Re: Ethics Undertakings

Dear Ms. McManus:

I am committed to the highest standards of ethical conduct for government officials. If confirmed as the Ambassador to the Holy See, as required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

My spouse and I have provided client services in the past through Gingrich Productions, Inc., and my husband may continue to do so. Upon confirmation, I will resign from my position with Gingrich Productions, Inc. My spouse and I will continue to have a financial interest in this entity, but I will not provide services material to the production of income. Instead, I will receive only passive investment income from it. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Gingrich Productions, Inc., unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I will not participate personally and substantially in any particular matter involving specific parties in which I know a former client of mine is a party or represents a party for a period of one year after I last provided service to that client, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). I also will not participate personally and substantially in any particular matter involving specific parties in which I know a client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I am the Vice Chairman and an owner of Elected.org, an entity that has no assets and generates no income, and that is currently in the process of being dissolved. Upon confirmation I will resign my position with Elected.org, and I will not perform any services for the entity, except that I will comply with any requirements involving legal filings, taxes and fees that are necessary to dissolve the entity. Until Elected.org is completely dissolved, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I also will resign from my positions with the following entities: The Gingrich Foundation, Inc., the Windy Hill Court Homeowners Association, and the Choir of the Basilica of the National Shrine of the Immaculate Conception. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Before learning of my consideration for a possible nomination to a position as the Ambassador to the Holy See, I entered into an agreement with Regnery Publishing to write a children's book, *Remember the Ladies*. I understand that I may not work on this book or perform any other services for compensation during my appointment to the position of the Ambassador to the Holy See if the Senate confirms my nomination. I will not participate personally and substantially in any particular matter involving specific parties in which I know Regnery Publishing is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I will retain my position as a trustee of the Callista Gingrich Revocable Trust. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Ambassador to the Holy See. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the Callista Gingrich Revocable Trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is a Senior Advisor at Dentons US, LLP, from which he receives a consulting fee. For as long as my spouse continues to work at Dentons US, LLP, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on my spouse's compensation or employment with the firm, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). I will not participate personally and substantially in any particular matter involving specific parties in which I know Dentons US, LLP or any client of my spouse is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d). In addition, for the duration of my appointment to the position of the Ambassador to the Holy See, my spouse has agreed not to communicate directly with the United States Embassy in Holy See on behalf of Dentons US, LLP or any client.

My spouse also provides consulting services to Barrick Gold, for which he receives a consulting fee and stock options. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Barrick Gold, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of Blue Ridge Networks, for which he receives stock options and an advisor fee. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Blue Ridge Networks, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of CSC Partners LLC, for which he has received equity in the company. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of CSC Partners LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

My spouse also serves on the advisory board of Pathway Genomics, for which he receives stock options. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Pathway Genomics, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, my spouse has a financial interest in The Lubbers Agency. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on this entity, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

In addition, I will recuse myself from participation on a case-by-case basis in any particular matter involving specific parties in which I determine that a reasonable person with knowledge of the relevant facts would question my impartiality in that matter, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

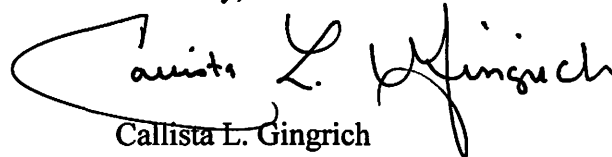
I have a managed account, and I will direct the account manager to obtain my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds. I will monitor whether the account manager is following this direction regarding prior approval.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but no later than 15 days after my appointment as required under 5 C.F.R. § 2638.305, unless granted an extension under that regulation. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Callista L. Gingrich". The signature is written in a cursive, flowing style. The first name "Callista" is written in a smaller, more compact script, followed by "L." and then "Gingrich" in a larger, more prominent script. The signature is positioned above the printed name.

Callista L. Gingrich

From: [Schultz, James D. EOP/WHO](#)
To: [Rodrick T. Johnson](#)
Cc: [Seth Jaffe](#); [Patrick J. Lightfoot](#); [Teresa L. Williamson](#)
Subject: Re: Certificate of Divestiture Ms. Conway and her spouse, George Conway
Date: Wednesday, August 09, 2017 4:52:34 PM

Thank you.

James D. Schultz
Senior Associate Counsel and Special Assistant to the President
Office of White House Counsel
(b) (6) (m)

> On Aug 9, 2017, at 4:42 PM, Rodrick T. Johnson <rjohnson@oge.gov> wrote:

>

> Good Afternoon, Mr. Schultz:

>

> Enclosed is a Certificate of Divestiture OGE 2017-111 for Kellyanne E. Conway, Counselor to the President, and Certificate of Divestiture OGE-2017-112 for Ms. Conway and her spouse, George Conway. We would appreciate your forwarding the original certificates to Ms. Conway. Also enclosed is a copy of the certificate for your files.

>

> The original certificate and one copy for your records will be mailed to you. We would appreciate your forwarding the original certificate to Ms. Conway, upon receipt.

>

> Please confirm receipt of this email by replying to all.

>

> Thanks, Again

> Rodrick Johnson

>

>

>

>

>

>

>

> _____
> OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

>

> _____
> <Conway, Kallyanne E. CD's 111 - 112.pdf>

OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). You may obtain copies of CDs by completing the fill and print PDF version of the OGE Form 201 and submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies of the CDs, available on OGE's website at: <https://extapps2.oge.gov/201/Presiden.nsf/All+Certificates+of+Divestiture>.

From: [Daniel L. Skalla](#)
To: (b)(6) - Sandra Mabry's email address
Subject: Reassigned WH Reports
Date: Friday, August 04, 2017 7:02:48 AM
Attachments: [image001.png](#)

Sandy,

The following reports have been reassigned as shown below. Please contact these OGE staff members regarding these reviews.

David:

Nonresponsive records



Ciara:

Nonresponsive records



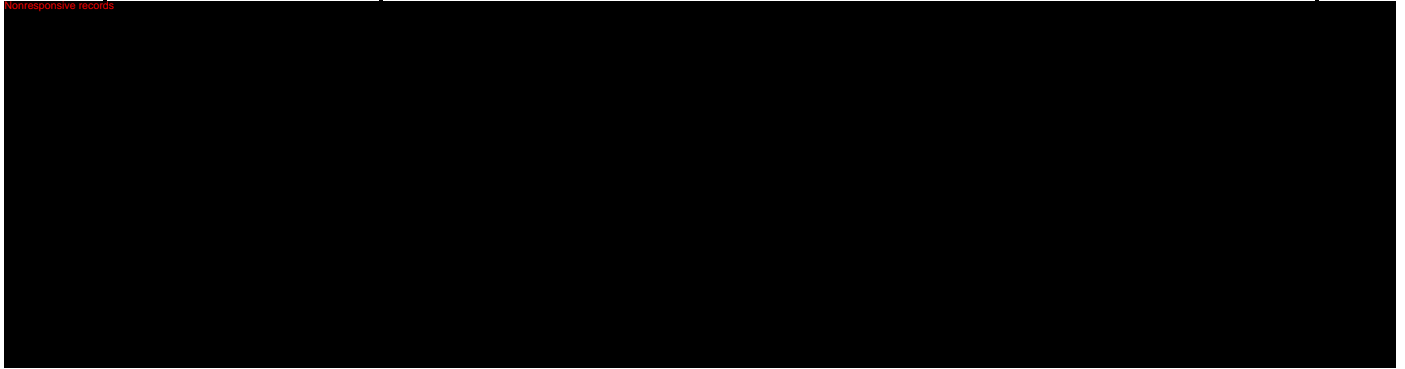
J:

Nonresponsive records



Conway, Kellyanne	White House Office [Counselor To The President]
-----------------------------------	---

Nonresponsive records



From: [Schultz, James D. EOP/WHO](#)
To: [Patrick J. Lightfoot](#)
Subject: RE: Conway Responses
Date: Tuesday, July 18, 2017 11:11:45 AM

Patrick - please call me.

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel
(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, July 18, 2017 9:40 AM
To: Schultz, James D. EOP/WHO (b) (6)
Subject: RE: Conway Responses

Hi Jim,

Just wanted to follow-up on (b) (5)

Thanks!

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Monday, July 17, 2017 6:20 PM
To: Patrick J. Lightfoot
Subject: RE: Conway Responses

Patrick - As to question 3, (b) (5), (b) (6).


JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel
(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Schultz, James D. EOP/WHO
Sent: Monday, July 17, 2017 6:15 PM
To: 'Patrick J. Lightfoot' <pjlightf@oge.gov>
Subject: RE: Conway Responses

(b)(4), (5), (6)

(b)(4), (5), (6)



JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]

Sent: Monday, July 17, 2017 3:05 PM

To: Schultz, James D. EOP/WHO (b) (6)

Subject: RE: Conway Responses

No problem, I've copied the original email below:

From: Patrick J. Lightfoot

Sent: Thursday, June 08, 2017 3:09 PM


To: 'Schultz, James D. EOP/WHO'

Subject: RE: Conway CD request

Hi Jim,

Below are my follow-up questions/comments on Ms. Conway's CD request:

(b) (5), (b) (6)



Thanks!

--Patrick

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Monday, July 17, 2017 3:01 PM

To: Patrick J. Lightfoot

Subject: RE: Conway Responses

Patrick - could you resend me the CD questions? I do not recall them and maybe thought they were the 278 questions. J

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]

Sent: Monday, July 17, 2017 2:57 PM

To: Schultz, James D. EOP/WHO (b) (6) >

Subject: RE: Conway Responses

Hi Jim,

Following up on the status of this along with the initial questions on Ms. Conway's CD request (sent 6/8).

Thanks!

--Patrick

--

Patrick J. Lightfoot

Assistant Counsel, Ethics Law & Policy Branch General Counsel & Legal Policy Division

U.S. Office of Government Ethics

1201 New York Ave NW, Suite 500

Washington, DC 20005

Telephone: (202) 482-9271

Visit OGE's website: >>>www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics<<<

-----Original Message-----

From: Patrick J. Lightfoot

Sent: Monday, June 12, 2017 1:57 PM

To: 'Schultz, James D. EOP/WHO'

Subject: RE: Conway Responses

No attachment found in search

Hi Jim,

Please see our second round of questions in the attached doc. The notes in red were your responses to initial questions. The report has been returned in Integrity.

--Patrick

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Monday, June 05, 2017 7:24 PM

To: Patrick J. Lightfoot

Subject: Conway Responses

7 page attachment withheld in full - (b)(3), (4), (5), (6)

Patrick - you should have the certified 278 in the morning.

From: [Schultz, James D. EOP/WHO](#)
To: [Patrick J. Lightfoot](#); [De La Vega, Scott](#)
Subject: RE: New Entrant Report Questions/Edits - Conway
Date: Wednesday, May 17, 2017 12:40:45 PM

I am working with her private lawyer on it. Should have something this week. J

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Wednesday, May 17, 2017 11:26 AM
To: Schultz, James D. EOP/WHO ; De La Vega, Scott
Subject: RE: New Entrant Report Questions/Edits - Conway

Hi Jim,

Any updates on the Conway report? Thanks!

--Patrick

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Wednesday, May 03, 2017 4:59 PM
To: Patrick J. Lightfoot; De La Vega, Scott
Subject: RE: New Entrant Report Questions/Edits - Conway

Patrick – can you send back the 278e?

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

From: Patrick J. Lightfoot [mailto:pjlightf@oge.gov]
Sent: Friday, April 21, 2017 2:26 PM
To: Schultz, James D. EOP/WHO (b) (6) >; De La Vega, Scott
(b) (6) >
Subject: RE: New Entrant Report Questions/Edits - Conway

Jim and Scott,

Following up on the status of this. Thanks!

Sincerely,

--

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500

Washington, DC 20005
Telephone: (202) 482-9271
Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: Patrick J. Lightfoot
Sent: Tuesday, April 11, 2017 2:33 PM
To: (b)(6) - James Schultz's email address; (b)(6) - Scott DeLaVega's email address
Subject: New Entrant Report Questions/Edits - Conway

Jim and Scott,

Please see my initial comments, etc. on Kellyanne Conway's New Entrant Report below. The report has been returned in *Integrity*.

Sincerely,

--

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division
U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271
Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

(b)(3), (5), (6)



QUESTIONS GENERALLY APPLICABLE TO REPORT:

(b)(3), (5), (6)



(b)(3), (5), (6)

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Subject: FW: Nominee
Date: Thursday, February 02, 2017 4:30:11 PM
Attachments: [20170202152934721.pdf](#)

1 page attachment withheld in full -
(b)(3), (4), (5), (6)

From: Kimberly L. Sikora Panza
Sent: Thursday, February 02, 2017 3:33 PM
To: 'Bender, Stuart - OE'
Cc: Kimberly L. Sikora Panza
Subject: Nominee

Hi Stuart,

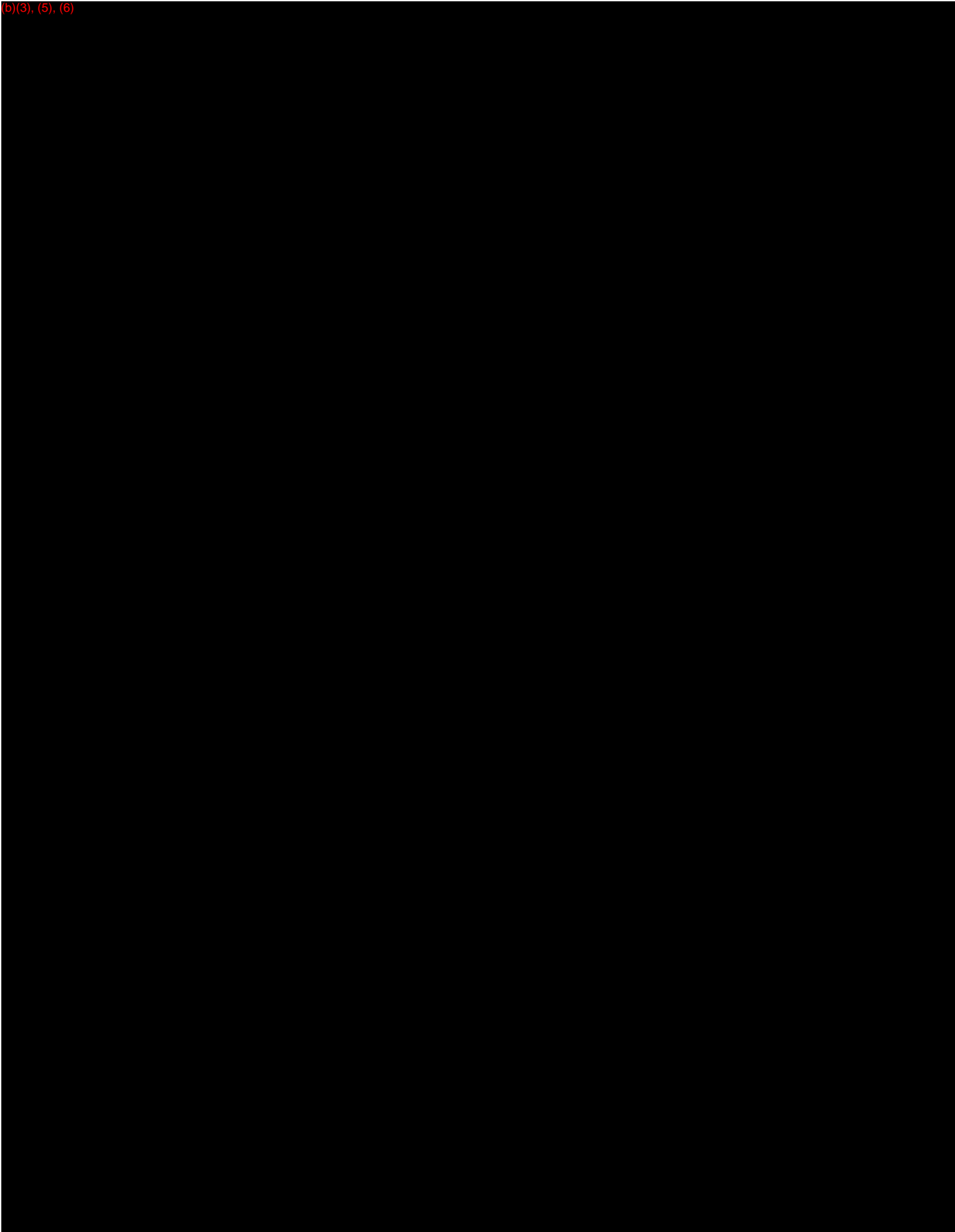
I look forward to working with you and your team on this report.

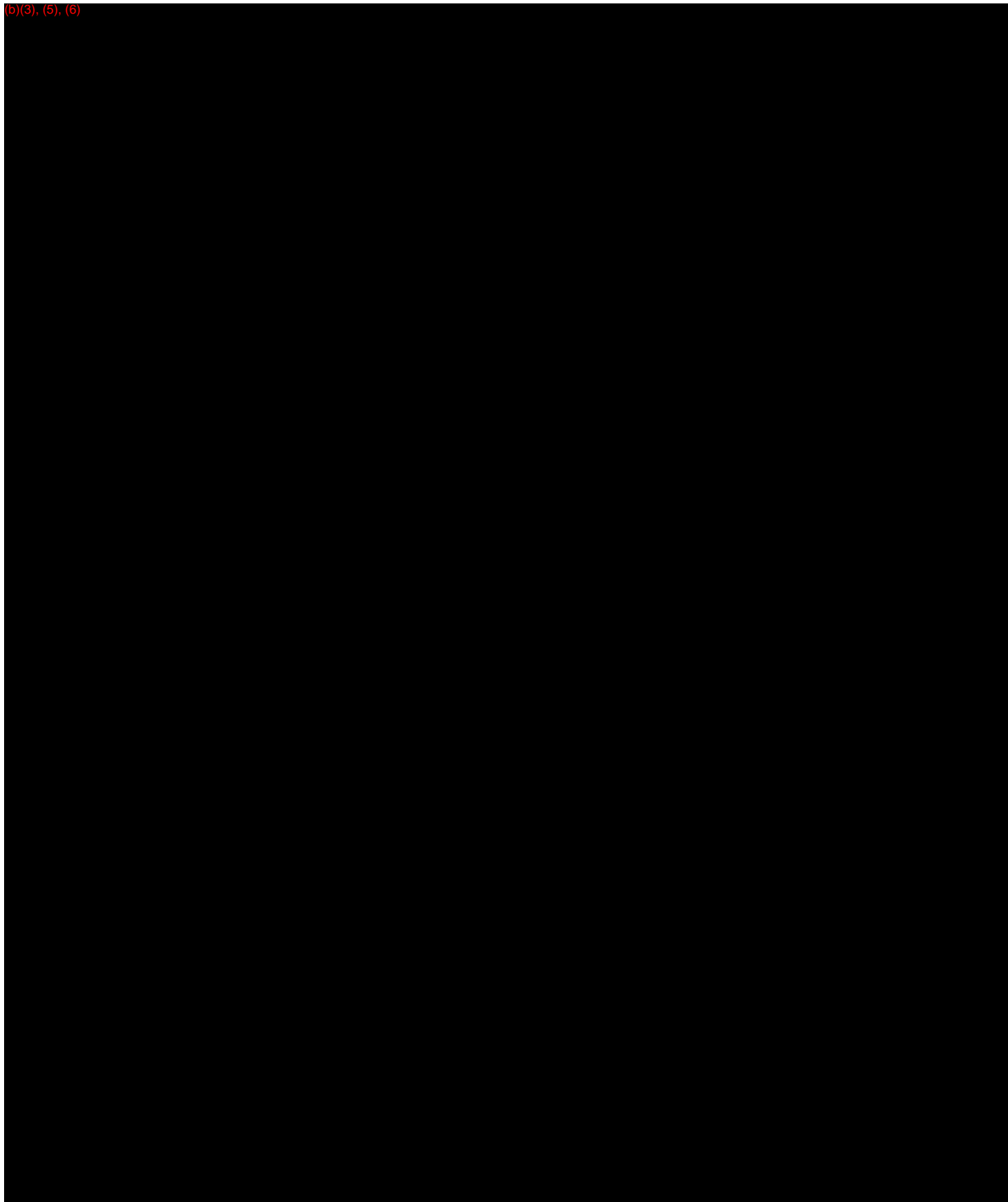
I've done an initial review of the report, and have the following preliminary questions.

General

(b)(3), (5), (6)







Nonresponsive records



Referral to USDA



Referral to USDA



Referral to USDA



On Feb 2, 2017, at 2:12 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Stuart,

Two quick preliminary questions-

- Do you have a mailing address for the filer or his representative? We would like to mail a physical copy of the Nominee Guide.
- Will you be working on this report, or should I be communicating with someone else on your team?

Thanks,
Kim

Referral to USDA



Referral to USDA



On Feb 2, 2017, at 1:36 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Stuart,

I'm assigned to this report. I need to review and will send you some preliminary questions this afternoon.

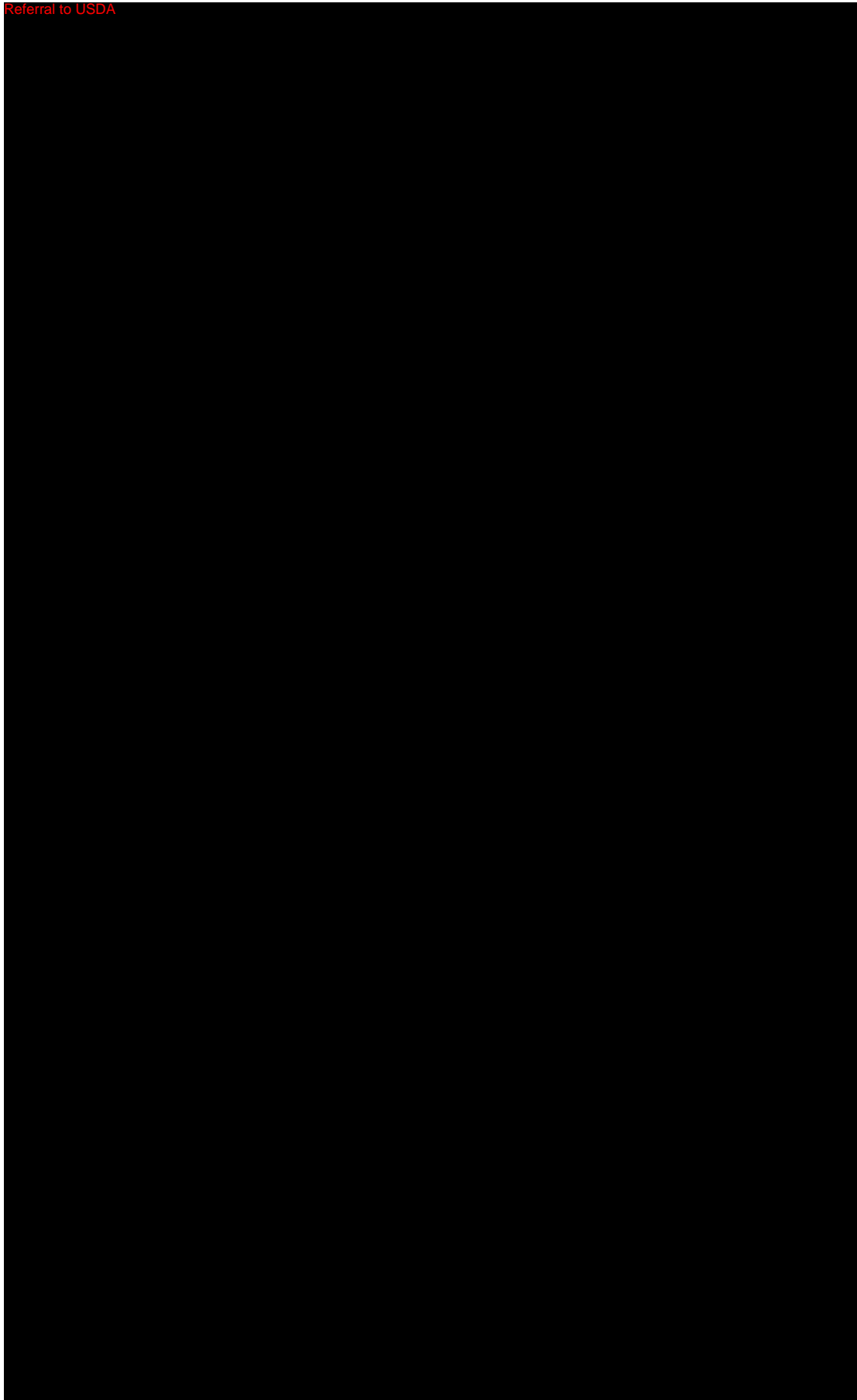
Kim

Referral to USDA



Referral to USDA





From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"; "Tobin, Andrew - OE"](#)
Subject: FW: Nominee
Date: Monday, February 06, 2017 10:06:53 AM
Attachments: [20170202152934721.pdf](#)

1 page attachment withheld in full -
(b)(3), (4), (5), (6)

Hi Stuart,

Thanks for all of the updates to the report, we're making great progress. I've gone through my questions/comments from Thursday, and have included below the ones that I believe are still "open" (many of these are just confirmation points, but I'll need the info to update my notes); I've also added various questions and comments below relating to updated information on the report.

Could you please let me know when you are available to discuss the report/some of these items?

Thanks,

Kim

(b)(3), (5), (6)



From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Subject: RE: Sorry I missed your call
Date: Wednesday, February 08, 2017 11:59:22 AM

Hi Stuart,

I am free until shortly before 1pm if you'd like to chat.

Kim

Referral to USDA



Referral to USDA



Referral to USDA



On Feb 9, 2017, at 8:10 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Good morning, Stuart and Andrew,

2 page attachment withheld in full - (b)(3), (4), (5), (6); 3 page attachment withheld in full - (b)(3), (4), (5), (6)

As indicated in my last email, I have some suggested edits to the endnotes. (b) (5), (b) (6)

or your ease of reference, I've attached a document showing my suggested edits in redline format, as well as a "clean" document showing what I anticipate the final entries looking like.

In reviewing the endnotes, I came up with another question: (b)(3), (5), (6)

Finally, Stuart, I spoke with Heather regarding your CD inquiry and have some additional information – could you give me a call at your convenience? 202.482.9214.

Please let me know if you have any questions or would like to discuss.

Kim

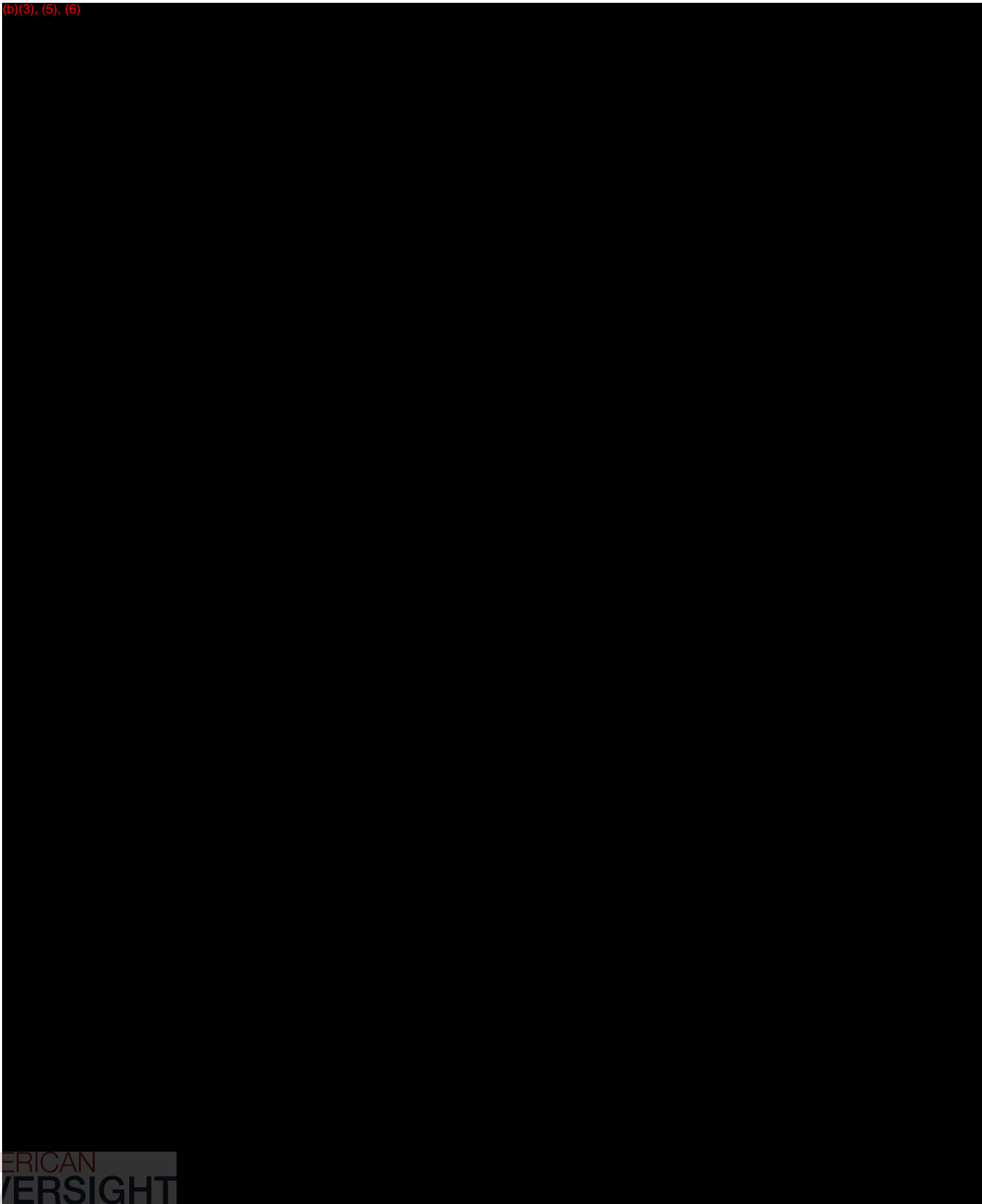
From: Kimberly L. Sikora Panza
Sent: Wednesday, February 08, 2017 4:17 PM
To: 'Bender, Stuart - OE'; 'Tobin, Andrew - OE'
Subject: Report

No attachment found in search

Stuart and Andrew-

I think we're making good progress on Mr. Perdue's report. As I reviewed the most recent version of the report, I identified a few new questions/comments and a handful of prior outstanding ones, listed below.

(b)(3), (5), (6)



(b)(3), (5), (6)



Thanks!

Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

<Suggested changes to endnotes [CLEAN].docx>

<Suggested changes to endnotes [REDLINE].docx>

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"; "Tobin, Andrew - OE"](#)
Subject: (b)(3), (6) chart
Date: Thursday, February 09, 2017 9:15:44 AM
Attachments: [businesses.docx](#)

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Stuart and Andrew,

I've put together a Word version of the earlier drawing I shared that shows my understanding of the (b)(3), (6) – pls see attached.

(b)(3), (5), (6)



Thanks in advance for your input.

Kim

Referral to USDA



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]

Sent: Thursday, February 09, 2017 9:51 AM

To: Tobin, Andrew - OE (b) (6); Bender, Stuart - OE (b) (6)

Subject: RE: Report

Hi Andrew,

Thanks!

(b)(3), (5), (6)



I think this addresses your Qs...please let me know if I missed anything

Kim

Referral to USDA



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]

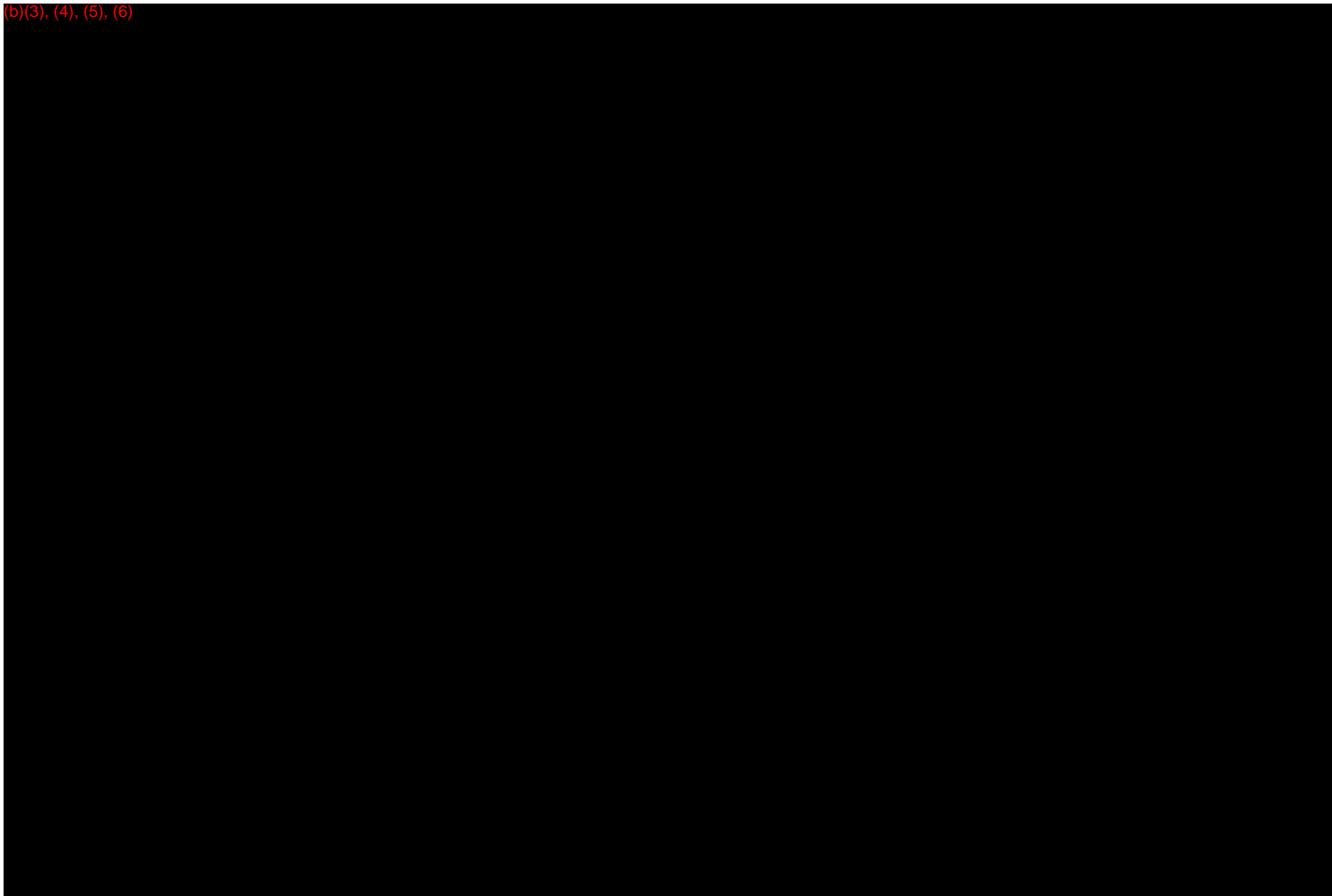
Sent: Wednesday, February 08, 2017 4:17 PM

To: Bender, Stuart - OE (b) (6); Tobin, Andrew - OE (b) (6)

Subject: Report

Stuart and Andrew-

(b)(3), (4), (5), (6)



Thanks!

Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Cc: ["Tobin, Andrew - OE"](#)
Subject: RE: Kim--Discussion with Sonny Perdue"s lawyers regarding (b)(3), (6)
Date: Tuesday, February 14, 2017 11:51:09 AM

Hi Stuart,

Could you let me know when you have a minute to discuss?

Thanks,
Kim

Referral to USDA

Referral to USDA

Referral to USDA



Referral to USDA



From: Kimberly L. Sikora Panza [mailto:klspanza@oge.gov]

Sent: Tuesday, February 14, 2017 2:24 PM

To: Tobin, Andrew - OE ; Bender, Stuart - OE

Subject: RE: Updated report

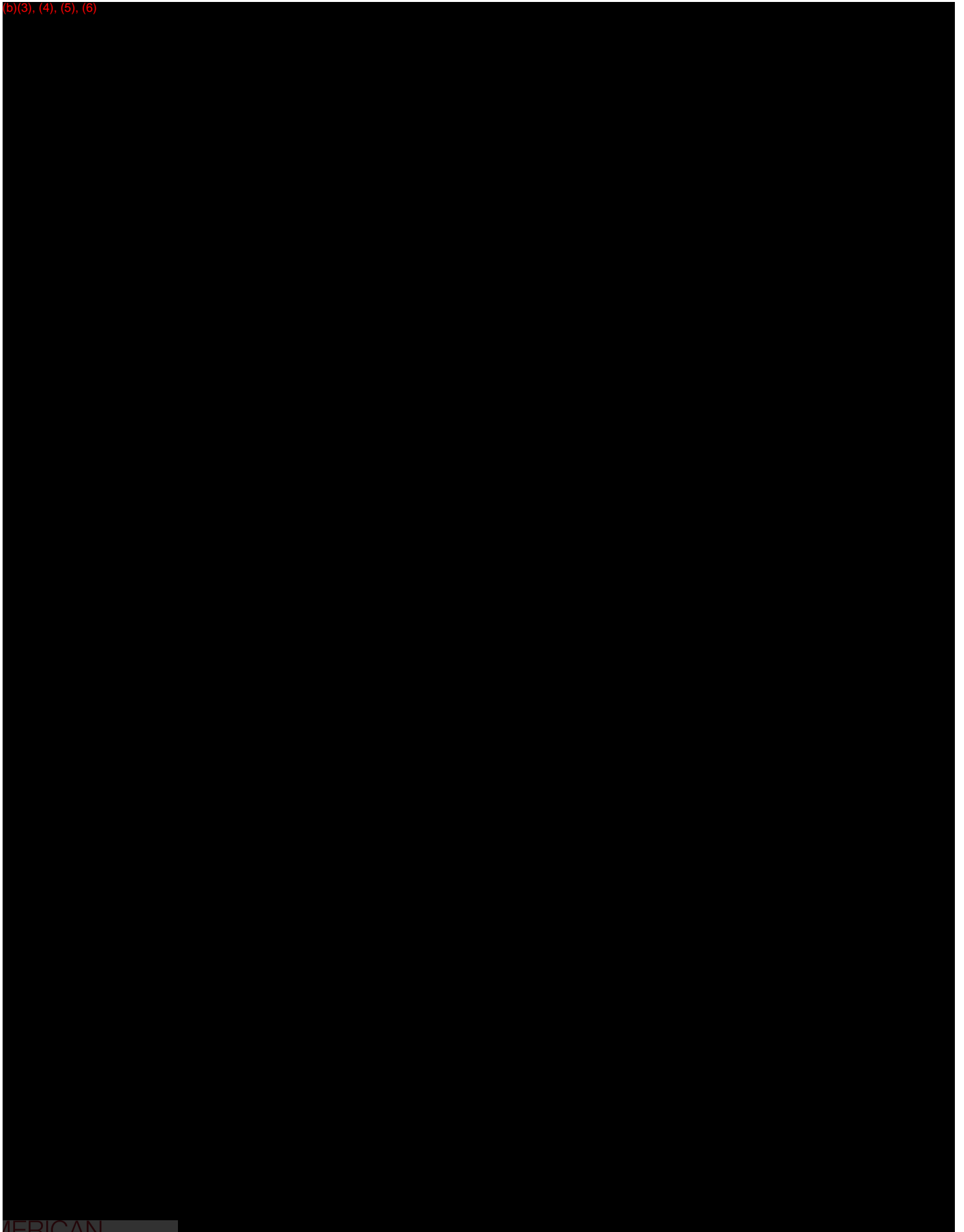
Hi Andrew,

Thanks for the updates to the report and additional explanations. Please see my further input below

(b)(3), (4), (5), (6)



(b)(3), (4), (5), (6)



(b)(3), (5), (6)



Kim

Referral to USDA



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Friday, February 10, 2017 5:27 PM

To: Bender, Stuart - OE <(b) (6)>; Tobin, Andrew - OE
<(b) (6)>

Cc: Monica M. G. Ashar <mmgashar@oge.gov>

Subject: Updated report

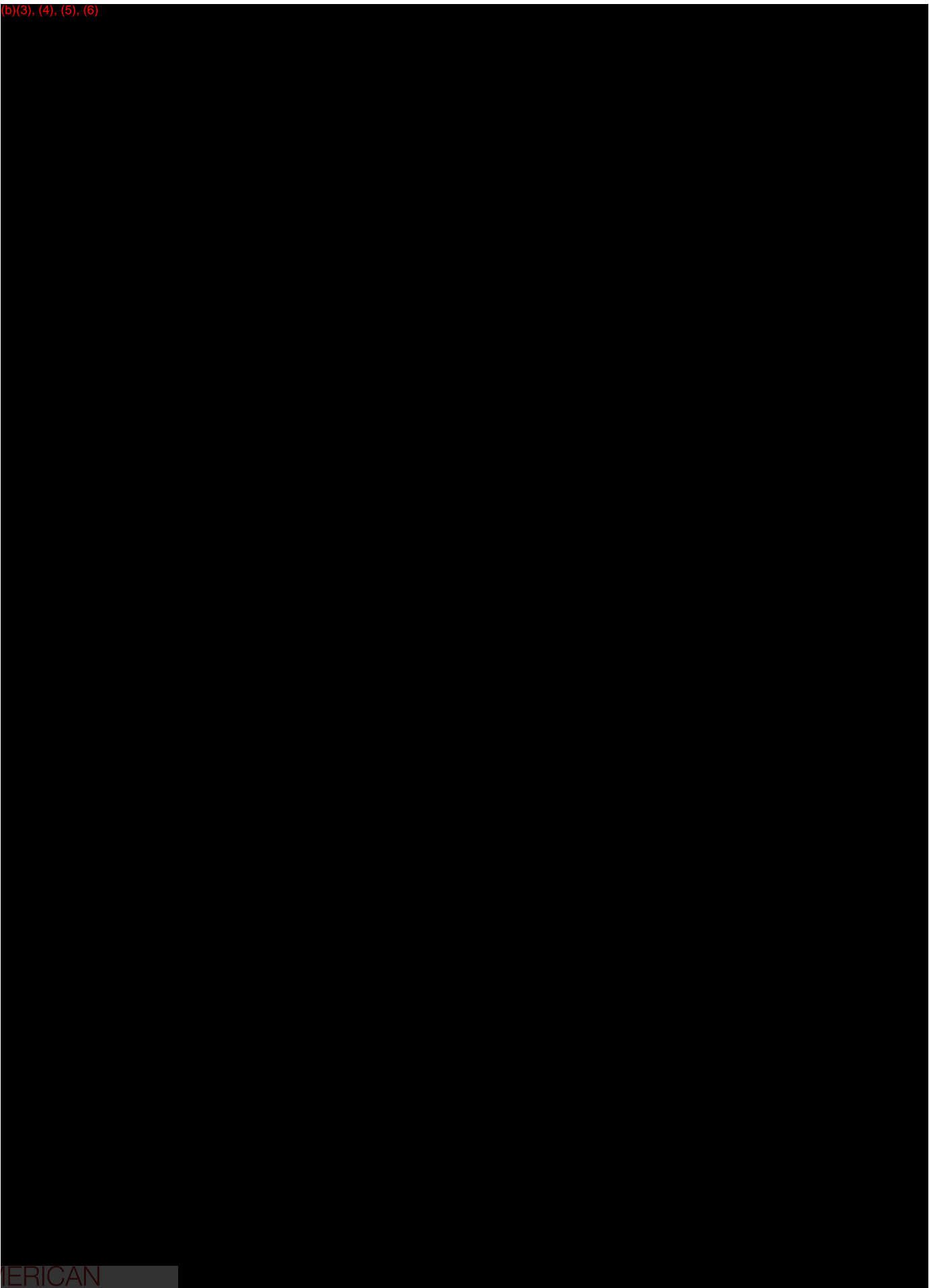
Hi Stuart and Andrew,

Thanks for the updates to the report. Here's what I have based on my review of the updated report:

(b)(3), (5), (6)



(b)(3), (4), (5), (6)



(b)(3), (4), (5), (6)



Thanks, and have a great weekend,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Referral to USDA



Referral to USDA



Referral to USDA



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Friday, February 24, 2017 4:33 PM

To: Bender, Stuart - OE (b) (6) >

Cc: Tobin, Andrew - OE (b) (6)

Subject: RE: Nominee

Thanks, Stuart, this is helpful. When you receive the written responses from the filer's attorneys, please forward them to us – the information will be helpful for our files (and of course to fully flesh out our understanding of things!)

Have a nice weekend.

Kim

Referral to USDA



Referral to USDA



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Thursday, February 23, 2017 9:15 AM

To: Bender, Stuart - OE <(b) (6)>

Cc: Tobin, Andrew - OE <(b) (6)>

Subject: RE: Nominee

Thanks for the update, Stuart!

Referral to USDA



Referral to USDA



On Feb 23, 2017, at 9:03 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Good morning, Stuart,
Checking in to see if you have had any further contact with the filer's attorneys – if you haven't been contacted by them, could you please reach out for a status update? I need to update my team, and know we need to provide current status to the White House tomorrow morning.

Thanks!

Kim

Referral to USDA



On Feb 21, 2017, at 9:23 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Good morning, Stuart,
I hope you had a nice long weekend – the weather was amazing!
Have you heard anything from the filer's attorneys? I wanted to touch base with you before providing my team with a status update.

Thanks,

Kim

Referral to USDA



On Feb 16, 2017, at 7:14 AM, Kimberly L. Sikora Panza
<klspanza@oge.gov> wrote:

Hi Stuart,
Just touching base to see if you were able to connect with
the filer's attorneys regarding the trust plans (following on
our discussion Tuesday re: the same).
Thanks in advance for your input,
Kim

OGE Confidential Notice: This email, including all
attachments, may constitute a Federal record or other
Government property that is intended only for the use of
the individual or entity to which it is addressed. This
email also may contain information that is privileged,
confidential, or otherwise protected from disclosure
under applicable law. If you are not the intended
recipient or the employee or agent responsible for
delivering the transmission to the intended recipient,
you are hereby notified that any dissemination,
distribution, copying or use of this email or its contents is
strictly prohibited. If you have received this email in
error, please notify the sender by responding to the
email and then immediately delete the email.

Referral to USDA



On Feb 28, 2017, at 10:15 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

I will clear my schedule - look forward to speaking with you!

Referral to USDA



On Feb 28, 2017, at 10:09 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

[202.482.9214](tel:202.482.9214).


Referral to USDA



Referral to USDA



On Feb 28, 2017, at 10:06 AM, Kimberly L. Sikora Panza
<klspanza@oge.gov> wrote:

Hi Stuart,
I understand that you are in Beltsville doing training right now, so thought I'd send an email.
I have a handful of minor clarification questions regarding the  (truly minor ones for purposes of updating my notes). Could you give me a ring when you are free?
Thanks,
Kim

Referral to USDA



On Feb 28, 2017, at 7:07 AM, Kimberly L. Sikora Panza
<klspanza@oge.gov> wrote:

Hi Stuart,
I have been working on the EA based on the information you provided below. I will let you know if we have any other questions once I have discussed the draft with Heather/Deb.
Thanks!
Kim

Referral to USDA



On Feb 28, 2017, at 3:42 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Stuart and Andrew-

1 page attachment withheld in full - (b)(3), (4), (5), (6)

OGE will be reviewing the nominee's report for preclearance. **Please be sure to instruct the nominee to personally review the report carefully once more**, given that the nominee will be personally responsible for all entries in the report as they currently appear.

Before OGE reviews this report for "preclearance," I'm sending you a list of some of the nominee's material representations on which we are relying. Please forward this message to the nominee and instruct him to **review and specifically confirm in writing (email is OK) each item below**.

Among other material representations, we are relying on the following:

<!--[if !supportLists]-->• <!--[endif]-->The nominee has personally reviewed all entries in the current version of the report and has affirmed that they are correct.

<!--[if !supportLists]-->• <!--[endif]-->The information on the attached chart (showing the structure/arrangement of the (b)(3), (6) is accurate and complete. **(see attachment)**

(b)(3), (6)

<!--[if !supportLists]-->• <!--[endif]-->For Part 1 and Part 4, the nominee has provided information covering the entire reporting period of January 1, **2015**, to

present.

<!--[if !supportLists]-->• <!--[endif]-->For Part 2, Part 5, and Part 6 the nominee has provided information covering the entire reporting period of January 1, **2016**, to present.

<!--[if !supportLists]-->• <!--[endif]-->The nominee does not have (b)(3), (6)

<!--[if !supportLists]-->• <!--[endif]-->The ethics agreement correctly describes all items addressed in the agreement.

Thank you for your assistance. Please let us know if you have any questions.

Best regards,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

<Trust structure etc.pdf>

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

Referral to USDA



On Mar 1, 2017, at 7:12 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Thanks, Stuart. Please keep me posted on the status of the EA review by the filer/his representatives.

Referral to USDA



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, February 28, 2017 3:02 PM

To: Bender, Stuart - OE (b) (6)

Cc: Tobin, Andrew - OE (b) (6)

Subject: RE: Perdue EA

Hi Stuart.

Thanks for your email.

Thanks for the catch in #1 – absolutely yes to that change.

Re #2, that should be fine – just for consistency's sake, do you want to say "Secretary of Agriculture" consistently in the document? I note that we say just "Secretary" in a few places –

Twice in para
3

<image001.png>

And once in penultimate para

<image002.png>

Thanks,
Kim

On Feb 28, 2017, at 1:48 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Hi Stuart and Andrew,

3 page attachment withheld in full - (b)
(3), (4), (5), (6)

Attached please find OGE's draft EA for Mr. Perdue. Can you please share this with the filer and his attorneys/advisors, and let us know your thoughts on the same?

Thanks,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

<Perdue Draft EA OGE Feb 28th.docx>

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

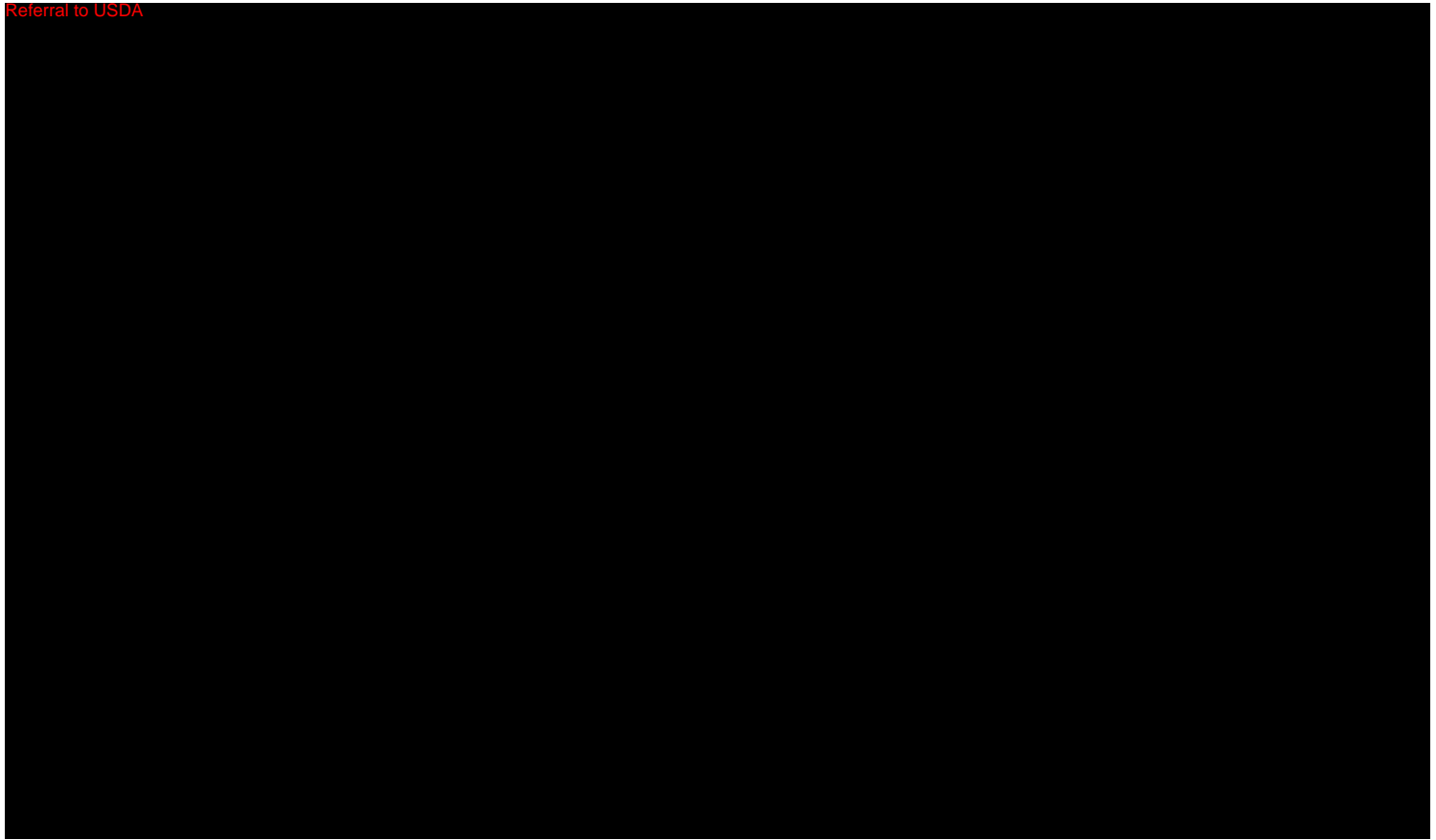
OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kimberly L. Sikora Panza](#)
To: ["Tobin, Andrew - OE"; "Bender, Stuart - OE"](#)
Subject: RE: Nom report
Date: Wednesday, March 01, 2017 4:52:22 PM

Thanks, Andrew!

Referral to USDA



From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Tuesday, February 28, 2017 3:36 PM
To: Bender, Stuart - OE (b) (6) Tobin, Andrew - OE
(b) (6)
Subject: Nom report

Hi Stuart and Andrew,

I have three minor nits on the nom report, all of which seek just a ***little*** more clarity in some of the Endnotes:

(b)(3), (5), (6)



I am going to send a separate email in a few moments that contains a list of questions we will need the filer to specifically confirm before we can preclear the report. Stay tuned....

Thanks,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

This electronic message contains information generated by the USDA solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Cc: ["Tobin, Andrew - OE"](#)
Subject: RE: Sonny Perdue's Draft Ethics Agreement (with his full name in signature block)
Date: Thursday, March 02, 2017 8:14:54 AM

Hi Stuart,

Thanks for the catch on that! I understand that the Governor is reviewing the contents of the EA and will update my team re the same.

Kim

Referral to USDA

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Cc: ["Tobin, Andrew - OE"](#)
Subject: RE: Kim-- Governor Perdue--Requested Revisions to Draft Ethics Agreement and Confirmation by the Nominee of OGE's Questions
Date: Friday, March 03, 2017 10:39:07 AM

Stuart,

(b) (5)



I will follow up with you on the other matters we discussed once I have additional input from my team.

Thanks,
Kim

Referral to USDA



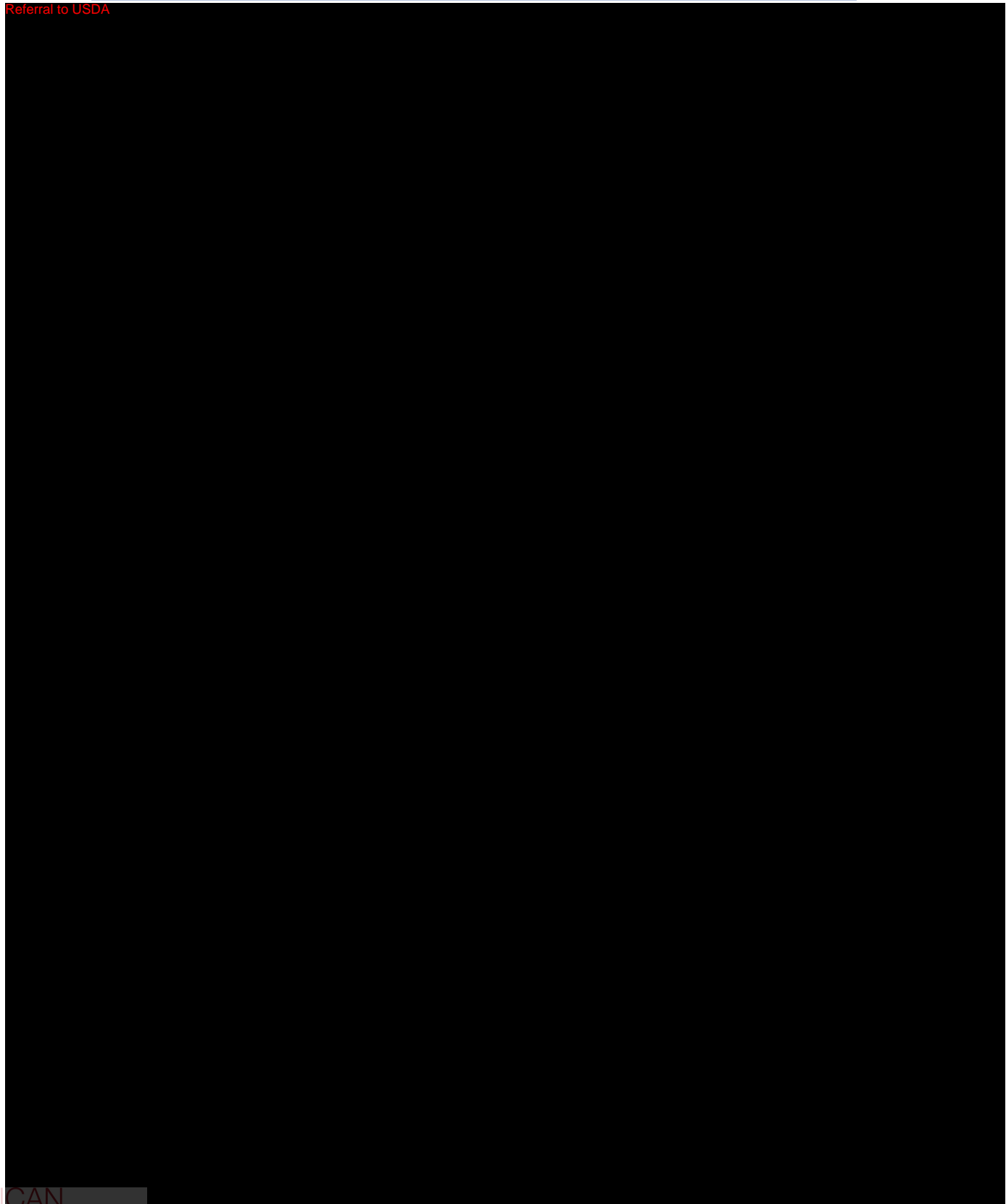
On Mar 3, 2017, at 7:56 AM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

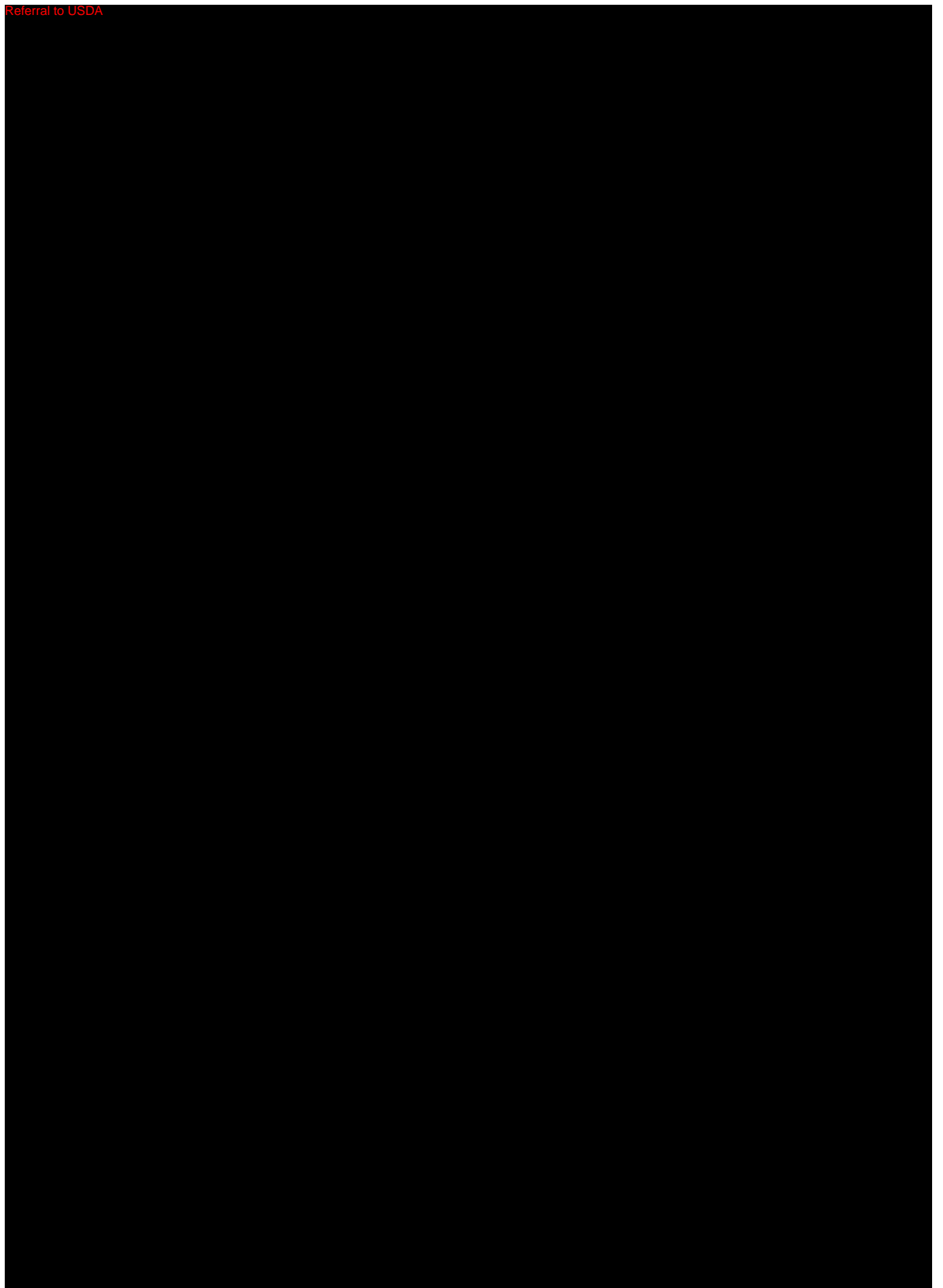
Hi Stuart,

Thanks for your message and this additional information. I will review and discuss with my team, and then circle back with you.

Kim

Referral to USDA





Referral to USDA



Referral to USDA



On Mar 3, 2017, at 2:20 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Hi Stuart and Andrew,

I found a brief discussion of (b)(3), (b)(6) in the following LAs-

(b) (5)



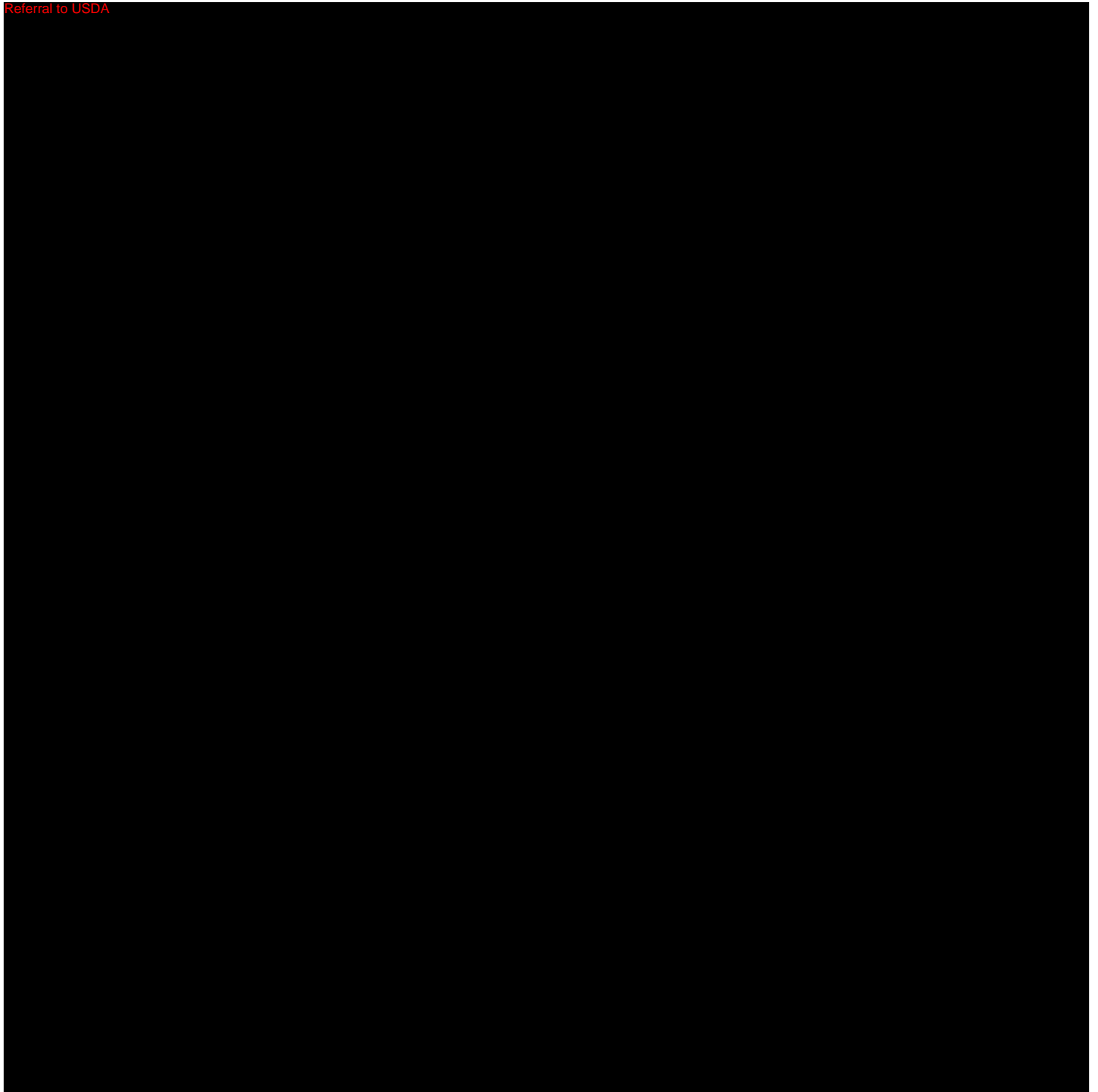
Thanks,
Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Kimberly L. Sikora Panza](#)
To: ["Bender, Stuart - OE"](#)
Subject: RE: A Note of Thanks!
Date: Monday, March 13, 2017 9:09:07 PM

Thank you, Stuart, for your kind words.... I certainly appreciate everything you and Andrew did on your end re: the report as well!

Referral to USDA



From: EA Compliance
To: "Bender, Stuart - OE"
Cc: "Tobin, Andrew - OE"; EA Compliance
Subject: Perdue ea
Date: Tuesday, May 02, 2017 2:50:14 PM

Dear Mr. Bender:

Mr. Perdue III was confirmed as Secretary of the U.S. Department of Agriculture on 4/24/17. This is a reminder that Mr. Perdue III has 90 days from the date of appointment to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via ea.compliance@oge.gov as soon as possible if an extension will be requested.

(b)(3), (5), (6)

The Designated Agency Ethics Official (DAEO) or the DAEO's designee is required to provide OGE with written confirmation (email is acceptable and preferred) that Mr. Perdue III has complied with the terms of his ethics agreement and that compliance was achieved within the 90-day deadline. The DAEO's or designee's confirmation to OGE must be based on written notification of compliance received from Mr. Perdue III. OGE should receive written confirmation from the DAEO or designee no later than seven days after the expiration of the 90-day deadline. Agencies are, however, encouraged to send written confirmation to OGE as soon as possible. Please consult OGE's Legal Advisory LA-14-06 for additional guidance.

Here is the link to the guidance:

[https://www2.oge.gov/Web/OGENsf/Legal%20Advisories/ECDADA000D6612BF85257E96005FBF0C/\\$FILE/eecbe744513c40b7a3c049def23f2fdd3.pdf?open](https://www2.oge.gov/Web/OGENsf/Legal%20Advisories/ECDADA000D6612BF85257E96005FBF0C/$FILE/eecbe744513c40b7a3c049def23f2fdd3.pdf?open)

Please forward confirmation of compliance to OGE at ea.compliance@oge.gov. Thank you for your assistance in this matter, and please contact ea.compliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise ea.compliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [EA Compliance](#)
To: "Bender, Stuart - OE"
Cc: [EA Compliance](#)
Subject: Perdue ea
Date: Tuesday, May 16, 2017 1:51:48 PM
Attachments: [EA Certification Secretary Perdue- AGRICULTURE.pdf](#)

EA certification available at [https://extapps2.oge.gov/2017/Presiden.nsl/5FBEE0FA390C5D6885258167006370A2/\\$FILE/Perdue%20II%20EA%20Certification%201%20of%201.pdf](https://extapps2.oge.gov/2017/Presiden.nsl/5FBEE0FA390C5D6885258167006370A2/$FILE/Perdue%20II%20EA%20Certification%201%20of%201.pdf)

Dear Mr. Bender,

In accordance with Program Advisory 17-03, we are providing the attached Certification for completion by Secretary Perdue to demonstrate compliance with the provisions of his ethics agreement.

Please ensure that Secretary Perdue completes this form and returns it to OGE by email to eacompliance@oge.gov no later than July 31 as stated in his ethics agreement.

If you have any questions, please contact Doug Chapman at eacompliance@oge.gov.

From: [Schultz, James D. EOP/WHO](#)
To: [Elaine Newton](#)
Subject: RE: OGE Comments on Miller NE Report (2-17-17)
Date: Friday, March 24, 2017 11:47:19 AM

Edits were made to the report and I believe resubmitted. (b)(3), (5), (6)

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) o)
m)

From: Elaine Newton [mailto:enewton@oge.gov]
Sent: Friday, March 24, 2017 11:10 AM
To: Schultz, James D. EOP/WHO (b) (6) >
Subject: OGE Comments on Miller NE Report (2-17-17)

Good Morning,

I am checking on the status of the report for Stephen Miller. I sent you my initial questions on February 17, 2017, and sent the report back to you in Integrity on March 10, 2017.

Please let me know if you have any questions.

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error,

please notify the sender by responding to the email and then immediately delete the email.

From: [Elaine Newton](#)
To: ["Schultz, James D. EOP/WHO"](#)
Bcc: [Elaine Newton](#)
Subject: RE: OGE Comments on Miller NE Report (2-17-17)
Date: Monday, March 27, 2017 12:39:44 PM
Attachments: [OGE Comments on Miller NE Report \(3-27-17\).docx](#)

2 page attachment withheld in full -
(b)(3), (4), (5), (6)

Thank you for the revised report on Stephen Miller. I have some follow-up questions (attached) regarding the report. Please let me know if it would be easier to have a short telephone conversation to discuss my questions.

Thanks, Elaine

Elaine Newton
Associate Counsel
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3915
Telephone: 202-482-9265

Rest of chain released in part above

From: [Schultz, James D. EOP/WHO](#)
To: [Elaine Newton](#)
Subject: OGE Comments on Miller NE Report (002)
Date: Thursday, May 18, 2017 12:29:35 PM
Attachments: [OGE Comments on Miller NE Report \(002\).docx](#)

2 page attachment withheld in full -
(b)(3), (4), (5), (6)

Edits have been made to 278.

From: Schultz, James D. EOP/WHO (b) (6)]
Sent: Tuesday, April 11, 2017 5:42 PM
To: Emory A. Rounds III
Cc: De La Vega, Scott
Subject: RE: NEW ENTRANT REPORT QUESTIONS #3

All confirmed and it is a (b)(3), (6) Scott, could you have someone change that? I cannot get in to edit.

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) o)
m)

From: Emory A. Rounds III [<mailto:earounds@oge.gov>]
Sent: Tuesday, April 11, 2017 9:29 AM
To: Schultz, James D. EOP/WHO (b) (6)
Cc: De La Vega, Scott (b) (6) >
Subject: NEW ENTRANT REPORT QUESTIONS #3

Good morning!

(b)(3), (5), (6)



(b)(3), (5), (6)



Thank you!

Emory

Emory Rounds
Associate Counsel
General Counsel and Legal Policy Division
Ethics Law and Policy Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917
Telephone: 202-482-9232

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error,

please notify the sender by responding to the email and then immediately delete the email.

From: [Mabry, Sandra S. EOP/WHO](#)
To: [Ciara M. Guzman](#)
Subject: RE: NE 278e for Hope Hicks
Date: Wednesday, August 30, 2017 10:36:10 AM
Attachments: [WHO response to OGE Comments \(Hicks\) sent to OGE.docx](#)

2 page attachment withheld in full - (b) (3), (5), (6)

Ciara, responses are attached. Thanks, Sandy

-----Original Message-----

From: Ciara M. Guzman [<mailto:cmguzman@oge.gov>]
Sent: Wednesday, August 30, 2017 8:15 AM
To: Mabry, Sandra S. EOP/WHO <(b) (6)>
Subject: RE: NE 278e for Hope Hicks

Hi Sandy,

(b) (5) Thanks.

Ciara

-----Original Message-----

From: Mabry, Sandra S. EOP/WHO <(b) (6)>
Sent: Thursday, August 24, 2017 10:04 AM
To: Ciara M. Guzman
Subject: RE: NE 278e for Hope Hicks

Ciara, just left a voice message for you. Please call to discuss responses to questions on Hope Hicks' report.
Thanks, Sandy (b) (6)

-----Original Message-----

From: Mabry, Sandra S. EOP/WHO
Sent: Wednesday, August 23, 2017 4:11 PM
To: 'Ciara M. Guzman' <cmguzman@oge.gov>
Subject: NE 278e for Hope Hicks

Ciara, I left a voice message for you. Please call me to discuss responses. Thanks, Sandy (b) (6)

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [EA Compliance](#)
To: (b)(6) - Janice Kaye's email address
Cc: [EA Compliance](#); (b)(6) - Monique Ricker's email address
Subject: FW: ea Lighthizer
Date: Thursday, May 18, 2017 10:07:26 AM
Attachments: [EA Certification U.S Trade Representative Lighthizer - TRADE REP.pdf](#)

EA certifications available at [https://extapps2.oge.gov/2017/Presiden.nsf/E0AB2EA501037D8F852581C6002C2077/\\$FILE/Lighthizer%20all%20EA%20Certification.pdf](https://extapps2.oge.gov/2017/Presiden.nsf/E0AB2EA501037D8F852581C6002C2077/$FILE/Lighthizer%20all%20EA%20Certification.pdf)

From: EA Compliance
Sent: Thursday, May 18, 2017 9:51 AM
To: (b)(6) - Janice Kaye's email address
Cc: EA Compliance; (b)(6) - Monique Ricker's email address
Subject: ea Lighthizer

Dear Ms. Kaye:

Ambassador Lighthizer was confirmed as United States Trade Representative on May 11, 2017. This is a reminder that Ambassador Lighthizer has 90 days from the date of confirmation (May 11, 2017) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via eampliance@oge.gov as soon as possible if an extension will be requested.

Ambassador Lighthizer is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). The Secretary should provide the completed and signed Certification to ethics officials as soon as possible but not later than August 09, 2017. The Certification should then be submitted to OGE no later than August 16, 2017 via email to eampliance@oge.gov.

Thank you for your assistance in this matter, and please contact eampliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise eampliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: LNAPPS1.USOGE@oge.gov
To: [Douglas L. Chapman](#); [Elaine E. Abbott](#); [Michelle M. Walker](#)
Cc: [EA Compliance](#)
Subject: Ethics Agreement Compliance 45-day reminder
Date: Sunday, June 18, 2017 1:18:47 AM

Hello,
Please send the following individuals their 45-day reminder.

Robert E Lighthizer, confirmed 5/11/2017
Agency: Office Of The US Trade Representative

Nonresponsive network records

Have a nice ethical day!

From: [CD](#)
To: [Stephanie Nonluecha](#)
Subject: FW: CD Request for Ambassador Lighthizer
Date: Monday, June 19, 2017 2:36:31 PM
Attachments: [lighthizer nominee report.pdf](#)
[Amb Lighthizer CD request.pdf](#)

278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>.

Stephanie,

submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies of the CDs, available on OGE's website at: <https://extapps2.oge.gov/201/Presiden.nsf/All+Certificates+of+Divestiture>.

Noresponsive records

Thanks for your help.

Elaine

-----Original Message-----

From: Rachel K. Dowell
Sent: Monday, June 12, 2017 4:12 PM
To: 'Kaye, Janice A. EOP/USTR'
Cc: Elaine Newton
Subject: FW: CD Request for Ambassador Lighthizer

Thanks, Janice. Forwarding this on - the assigned reviewer will let you know if any additional information is needed.

Referral to USTR

From: [Douglas L. Chapman](#)
To: [Michelle M. Walker](#); [Elaine E. Abbott](#); [EA Compliance](#)
Subject: EA Compliance Extension Request
Date: Wednesday, July 26, 2017 9:06:55 AM

Michelle/Elaine:

Janice Kaye from the Office of the U.S. Trade Representative called to inquire about an EA compliance extension for Robert Lighthizer, US Trade Representative. (b) (5)

She will be submitting the formal request via letter emailed to ecompliance@oge.gov. Please keep an eye out for it and let me know when it comes in.

Also, Ms. Kaye is aware that Mr. Lighthizer must still submit a certification by the original due date stating what provisions of his EA he has complied with and then a second certification after he has complied with the remaining provisions, in accordance with PA-17-03.

As always, please let me know if you have any questions,

Doug

Doug Chapman
Chief, Program Review Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW Suite 500
Washington, DC 20005
202-482-9223

Referral to USTR



From: [EA Compliance](#)
To: ["Kaye, Janice A. EOP/USTR"](#)
Cc: [EA Compliance](#)
Subject: Ambassador Lighthizer certification of ethics agreement
Date: Thursday, August 03, 2017 3:14:30 PM

Dear Ms. Kaye,

Thank you for the Certification of Ethics Agreement of Ambassador Lighthizer.

Sincerely,

OGE Compliance Division

Referral to USTR



Nonresponsive records



Referral to USTR



From: Daniel L. Skalla [<mailto:dlskalla@oge.gov>]

Sent: Monday, August 14, 2017 11:05 AM

To: Kaye, Janice A. EOP/USTR (b) (6)

Cc: Grace A. Clark <gaclark@oge.gov>; 278Tracking <278Tracking@oge.gov>

Subject: RE: Lighthizer 278-T (8/2/17)

Hi Janice,

(b)(3), (5), (6)



Thanks,
Dan

Referral to USTR



From: Daniel L. Skalla [<mailto:dlskalla@oge.gov>]

Sent: Monday, August 14, 2017 10:17 AM

To: Kaye, Janice A. EOP/USTR (b) (6)

Cc: Grace A. Clark <gaclark@oge.gov>; 278Tracking <278Tracking@oge.gov>

Subject: Lighthizer 278-T (8/2/17)

Hi Janice,

(b)(3), (5), (6)



Thank you,

Dan Skalla
Chief, Financial Disclosure Branch
Compliance Division
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Tel. 202.482.9222
Fax 202.482.9238

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [EA Compliance](#)
To: ["Kaye, Janice A. EOP/USTR"](#)
Cc: [EA Compliance](#)
Subject: RE: request for compliance extension for Ambassador Robert E. Lighthizer
Date: Thursday, October 26, 2017 3:00:43 PM

Dear Ms. Kaye,

Thank you for the ethics agreement certification compliance from Ambassador Lighthizer.

Sincerely,

The Compliance Division

Referral to USTR



-----Original Message-----

From: EA Compliance [<mailto:eacompliance@oge.gov>]
Sent: Thursday, October 5, 2017 1:53 PM
To: Kaye, Janice A. EOP/USTR (b) (6)
Cc: EA Compliance <eacompliance@oge.gov>
Subject: RE: request for compliance extension for Ambassador Robert E. Lighthizer

Dear Ms. Kaye:

Ambassador Lighthizer's was confirmed on 5/11/2017. The Ambassador sent his first Ethics Agreement Compliance (Certification) on 8/2/2017. This is a reminder that the second Ethics Agreement Compliance (Certification) needs to be completed and signed by October 5, 2017. The Certification should then be submitted to OGE no later than October 12, 2017. The second Certification was for the element that was given an approving extension, the Ambassador's Cornerstone Concentrated 30 Investment Account and the London Company Large Cap Value Account.

Thank you for your assistance in this matter, and please contact eacompliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise eacompliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

-----Original Message-----

From: EA Compliance
Sent: Monday, July 31, 2017 2:07 PM
To: 'Kaye, Janice A. EOP/USTR'
Cc: EA Compliance

Subject: RE: request for compliance extension for Ambassador Robert E. Lighthizer

Hi Janice,

Attached is OGE's letter approving an extension of Ambassador Lighthizer's ethics agreement compliance due date, as it applies to the (b)(3), (6)

We are sending the hard copy letter via US mail. Also attached are the Certification of Ethics Agreement Compliance documents he'll be required to complete and submit. Please let us know if you have any questions.

Sincerely,

Doug Chapman
Chief, Program Review Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW Suite 500
Washington, DC 20005
202-482-9223

Referral to USTR

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Ciara M. Guzman](#)
To: ["Mabry, Sandra S. EOP/WHO"](#)
Subject: RE: BANNON
Date: Thursday, October 26, 2017 12:13:47 PM

Sandy, I just returned the report. Thanks.

Ciara

From: Mabry, Sandra S. EOP/WHO (b) (6)
Sent: Thursday, October 26, 2017 12:09 PM
To: Ciara M. Guzman
Subject: RE: BANNON

Ciara, I just left a phone message for you. Please return Bannon's report to the WH so I can update it. Thanks, Sandy

From: Ciara M. Guzman [<mailto:cmguzman@oge.gov>]

Sent: Monday, October 23, 2017 1:36 PM

To: Mabry, Sandra S. EOP/WHO (b) (6)

Subject: FW: BANNON

Hi Sandy,

Please see below Mr. Schultz's email. Per our conversation, I have highlighted the items that need further clarification and/or were not addressed in the current version of the report. We can discuss later this week. Additionally, on a second email Mr. Schultz indicated that (b)(3), (6) include this when editing the report. Thanks.

Ciara

From: Lori Kelly
Sent: Wednesday, October 11, 2017 8:02 AM
To: Ciara M. Guzman
Cc: 278Tracking
Subject: FW: BANNON

Hi Ciara,

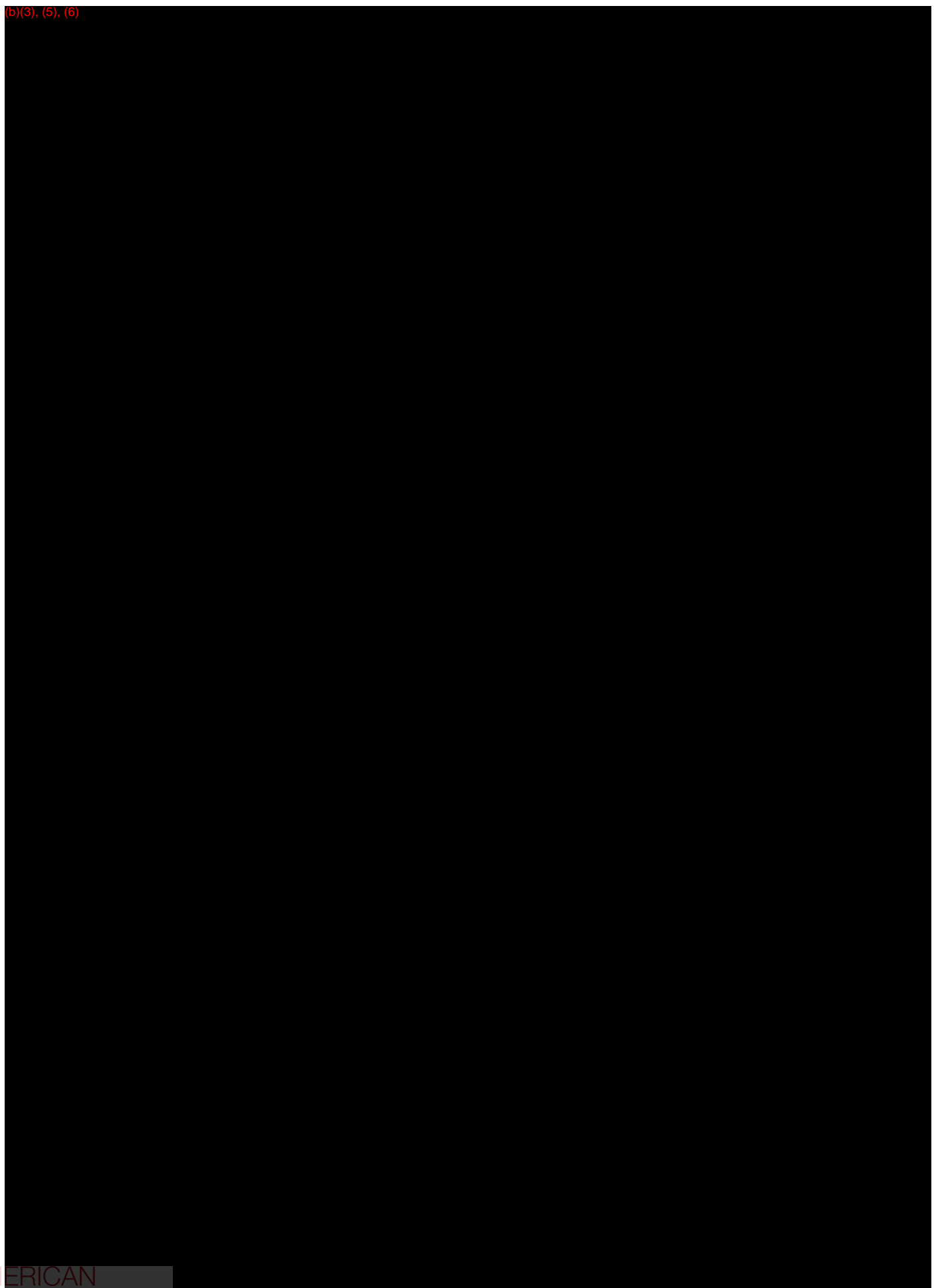
James emailed this to me and I see in FDTs the report is assigned to you. I forwarded the NE report to you in Integrity.

Lori

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Tuesday, October 10, 2017 5:00 PM
To: Lori Kelly
Subject: BANNON
Lori – please find the responses.

(b)(3), (5), (6)





(b)(3), (5), (6)



JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) (o)
(m)

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

Nonresponsive records

-----Original Message-----

From: Kimberly L. Sikora Panza
Sent: Thursday, April 06, 2017 9:55 AM
To: Elaine Newton
Subject: FW: COD PACKAGE

OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). You may obtain copies of CDs by completing the fill and print PDF version of the OGE Form 201 and submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies of the CDs, available on OGE's website at: <https://extapps2.oge.gov/201/Presiden.nsf/All+Certificates+of+Divestiture>.

Hi Elaine-

Here's the electronic copy, per your VM (b) (6)

Nonresponsive records

Thanks
Kim

Nonresponsive records

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Monday, March 06, 2017 11:01 AM
To: David J. Apol
Subject: COD PACKAGE

No attachment found in search

Dave - Attached please find the COD package for Mr. Bannon. His draft 278 is available for review on integrity.
Jim

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6)
(o)
(m)

From: [Kimberly L. Sikora Panza](#)
To: [David J. Apol](#)
Subject: FW: Bannon CD request
Date: Tuesday, April 11, 2017 7:09:02 AM

Hi Dave,

Below please find Jim's responses to your questions.

I am available to discuss at your convenience.

Kim

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Monday, April 10, 2017 3:04 PM
To: Kimberly L. Sikora Panza
Subject: RE: Bannon CD request

Hi Jim,

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:

(4), (5), (6)



JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b) (6)

o)
m)

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Friday, April 7, 2017 1:25 PM

To: Schultz, James D. EOP/WHO (b) (6)

Subject: RE: Bannon CD request

Hi Jim,

The CD package is with Dave right now, and he wanted me to ask you these follow up questions:

(5), (6)

Thank you in advance for your input on these additional questions related to the CD. (As you know, I also am the reviewer for Mr. Bannon's New Entrant report; we will be sending questions on his report (not related to the CD) separately.)

Kim

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Thursday, April 06, 2017 11:46 AM

To: Kimberly L. Sikora Panza

Subject: Re: Bannon CD request

Jim. I believe I responded. (b) (5), (b) (6). Any update on the COD?

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b) (6)

)

On Apr 4, 2017, at 3:39 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Hi Jim,

I have one additional question

(b) (6)

Thanks,

Kim

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Tuesday, April 04, 2017 9:48 AM
To: Kimberly L. Sikora Panza
Subject: RE: Bannon CD request

Yes.

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

White House Counsel

(b) (6)

(o)

(m)

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Tuesday, April 4, 2017 9:47 AM
To: Schultz, James D. EOP/WHO (b) (6)
Subject: RE: Bannon CD request

Good morning, Jim,

Thanks for your email. I am available to speak now, if you are free – is the
(b) (6) number the best number to reach you?

Thanks,

Kim

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Tuesday, April 04, 2017 9:22 AM
To: Kimberly L. Sikora Panza
Subject: RE: Bannon CD request

Kim – as you know, Steve’s 278 has been finalized. Can we talk this morning regarding the COD?

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President

Office of the White House Counsel

(b) (6)

(o)

(m)

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]
Sent: Friday, March 24, 2017 4:39 PM
To: Schultz, James D. EOP/WHO (b) (6)

Subject: RE: Bannon CD request

Good afternoon, Jim,

I hope you are well.

I am writing to touch base regarding the Bannon CD, and follow up re: a signed version of the report and my clarification questions below. At your convenience, could you please let me know the status of things?

Thank you in advance for your input.

Best regards,

Kim

From: Kimberly L. Sikora Panza

Sent: Wednesday, March 15, 2017 12:44 PM

To: 'Schultz, James D. EOP/WHO'

Subject: RE: Bannon CD request

Thank you for the additional information. Could you please let me know when the signed version of the report is available?

I also would appreciate your help clarifying a few items on the report. Could you please provide a brief description of the following companies:

(5), (6)



Thank you in advance for your input.

Best regards,

Kim

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Monday, March 13, 2017 9:26 AM

To: Kimberly L. Sikora Panza

Subject: Re: Bannon CD request

The report will be available shortly.

(5), (6)



(5), (6)



James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b) (6) (m)

On Mar 8, 2017, at 2:48 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

No attachment found in search



Good afternoon,

I am the OGE reviewer assigned to review the CD request for Mr. Bannon.
I have the following questions regarding the CD request – thank you in

advance for your input!

(5), (6)



Finally, for your future reference, attached please find the sample CD request format, which asks questions regarding the various pieces of information we need to process a CD request. Most agencies submit CD requests using this form, and using the form can help streamline the CD review process on our end.

Thank you in advance for your input.

Best regards,

Kim

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is

From: [Schultz, James D. EOP/WHO](#)
To: [Rodrick T. Johnson](#)
Cc: [Elaine Newton](#); [Sandra S. Mabry](#); [Teresa L. Williamson](#); [Kimberly L. Sikora Panza](#)
Subject: RE: Certificate of Divestiture for Stephen K. Bannon
Date: Wednesday, April 12, 2017 11:02:38 AM

We are in receipt of Mr. Bannon's COD.

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) [REDACTED]
o)
m)

From: Rodrick T. Johnson [mailto:rjohnson@oge.gov]
Sent: Wednesday, April 12, 2017 9:33 AM
To: Schultz, James D. EOP/WHO (b) (6) >
Cc: Elaine Newton <enewton@oge.gov>; Sandra S. Mabry <ssmabry@oge.gov>; Teresa L. Williamson <tlwillia@oge.gov>; Kimberly L. Sikora Panza <klspanza@oge.gov>
Subject: Certificate of Divestiture for Stephen K. Bannon
Importance: High

OGE regulations provide for a special access provision for Certificates of Divestiture (CDs). You may obtain copies of CDs by completing the fill and print PDF version of the OGE Form 201 and submitting your request to 201forms@oge.gov. OGE has also created an automated tool to request copies of the CDs, available on OGE's website at: <https://extapps2.oge.gov/201/Presiden.nsf/All+Certificates+of+Divestiture>.

Good Morning, Mr. Schultz:

Attached is the Certificate of Divestiture OGE-2017-031 for Stephen K. Bannon, Assistant to the President and Chief Strategist to the President. We would appreciate your forwarding the original certificate to Mr. Bannon. Also enclosed is a copy of the certificate for your files.

The original certificate and one copy for your records will be mailed to you. We would appreciate your forwarding the original certificate to Mr. Bannon, upon receipt.

Please confirm receipt of this email by replying to all.

Thanks, Again
Rodrick Johnson

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use

From: [Kimberly L. Sikora Panza](#)
To: ["Schultz, James D. EOP/WHO"](#)
Subject: RE: Bannon New Entrant Report
Date: Friday, July 14, 2017 3:57:39 PM

Good afternoon, Jim,

I am writing to follow up on the Bannon report – at your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza
Sent: Monday, June 26, 2017 4:31 PM
To: 'Schultz, James D. EOP/WHO'
Subject: RE: Bannon New Entrant Report

Good afternoon, Jim,

I am writing to touch base re the Bannon report – at your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza
Sent: Friday, June 16, 2017 9:54 AM
To: 'Schultz, James D. EOP/WHO'
Subject: RE: Bannon New Entrant Report

Good morning, Jim,

I hope you are well. I am writing to check in on the Bannon report – could you please let me know the status at your convenience?

Thanks!

Kim

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Tuesday, June 06, 2017 4:08 PM
To: Kimberly L. Sikora Panza
Subject: Re: Bannon New Entrant Report
Sorry. Got pulled into something else. I'm trying to get his done this week.

James D. Schultz

Senior Associate Counsel and Special Assistant to the President

Office of White House Counsel

(b) (6) m)

On Jun 6, 2017, at 4:05 PM, Kimberly L. Sikora Panza <klspanza@oge.gov> wrote:

Good afternoon, Jim,

I am writing to touch base on the Bannon report – at your convenience, could you please let me know the status?

Thank you,

Kim

From: Kimberly L. Sikora Panza
Sent: Thursday, May 25, 2017 4:29 PM
To: Schultz, James D. EOP/WHO
Subject: RE: Bannon New Entrant Report
Good afternoon, Jim,

I am writing to touch base on the Bannon New Entrant Report. At your convenience, could you please let me know the status?

Thanks,

Kim

From: Kimberly L. Sikora Panza
Sent: Tuesday, May 16, 2017 11:04 AM
To: 'Mabry, Sandra S. EOP/WHO'
Cc: Schultz, James D. EOP/WHO
Subject: RE: Bannon New Entrant Report
Thanks!

From: Mabry, Sandra S. EOP/WHO (b) (6)
Sent: Tuesday, May 16, 2017 10:56 AM
To: Kimberly L. Sikora Panza
Cc: Schultz, James D. EOP/WHO
Subject: RE: Bannon New Entrant Report
Kim, Jim is working on this one. I have copied him on this email. Sandy

From: Kimberly L. Sikora Panza [<mailto:klspanza@oge.gov>]

Sent: Tuesday, May 16, 2017 8:02 AM

To: Mabry, Sandra S. EOP/WHO (b) (6)

Subject: FW: Bannon New Entrant Report

Hi Sandy,

Are you also working on the Bannon report? If so, at your convenience, could you please provide a status update?

Thanks!

Kim

From: Kimberly L. Sikora Panza

Sent: Thursday, May 04, 2017 2:08 PM

To: (b) (6) - James Schultz's email address

Cc: 'Mabry, Sandra S. EOP/WHO'; (b) (6) - Scott DelaVega's email address; Kimberly L. Sikora Panza

Subject: Bannon New Entrant Report

Good afternoon,

I am the OGE reviewer assigned to review the New Entrant report for Steve Bannon. Please see below for my preliminary questions/comments based on my review of the report. I look forward to working with you!

(b)(3), (5), (6)

Best regards,
Kim Sikora Panza

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Heather A. Jones](#)
To: ["Jane Halprin"](#); (b) (6) - Patrick Carney's email address
Subject: How to Submit
Date: Friday, March 10, 2017 5:56:59 PM
Attachments: [Submit Report.docx](#)

Attachment released below

Heather Jones

(b) (6)

Office of Government Ethics

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: [@OfficeGovEthics](#)

Submitting a Nominee Report after Nomination

1. Log into *Integrity*, <https://integrity.gov>.
2. On the “My Tasks” page, click the “Sign” button next to your Nominee report. The report will open in a new window.

YEAR	ITEM	TYPE	AGENCY	GROUP	POSITION	DUE DATE	STATUS	DATE FILED	ACTION
2016	Nominee Report	278	Sample Agency	Sample Agency, Nominee Group	Sample Position		Draft, Pre-Cleared	03/18/16	Sign

3. Click the “Submit Report” link on the lower left side of the page.

General Information: Filer, Sample

REPORT SUMMARY

FILER SNAPSHOT

Filer:	Filer, Sample	Item:	Nominee Report	Status:	Draft, Pre-Cleared
Agency:	Sample Agency	Report type:	278	Spouse:	Yes
Position:	Sample Position	Report Year:	2016		

REVIEWER & FILER INFORMATION

Filer Category:	PAS	Public Availability:		Agency Reviewer:	
Filer Status:				OGE Reviewer:	
Amendment:					

DUE DATES & EXTENSIONS

4. The “Submit OGE Form 278e” page will display. Scroll down your report to check for accuracy.

Submit OGE Form 278e.

TO SUBMIT YOUR OGE FORM 278E, CHECK THE BOX AT THE BOTTOM OF THIS PAGE AND SELECT THE "SUBMIT OGE FORM 278E" BUTTON.

Nominee Report | U.S. Office of Government Ethics, 5 C.F.R. part 2634 | Form Approved: OMB No. (3209-0001) (March 2014)

Executive Branch Personnel
Public Financial Disclosure Report (OGE Form 278e)

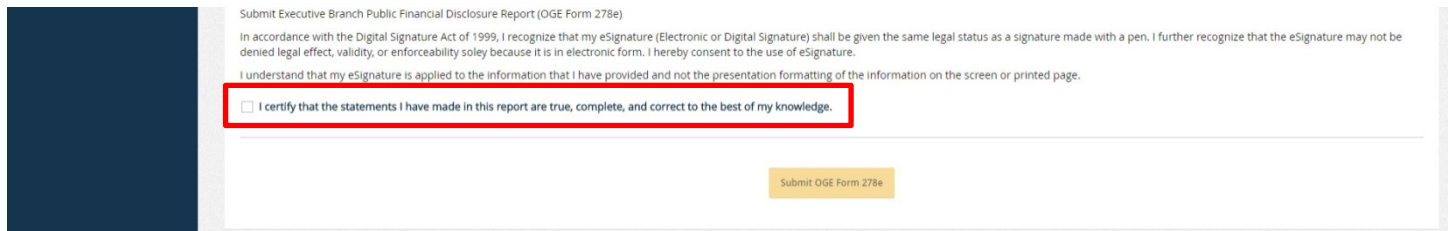
Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.
/s/ Filer, Sample [electronically signed on 03/18/16 by Filer, Sample in Integrity.gov]

Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

Other review conducted by:

U.S. Office of Government Ethics Certification

5. Scroll to the bottom of the page and check the box next to the “I certify...” statement.



Submit Executive Branch Public Financial Disclosure Report (OGE Form 278e)

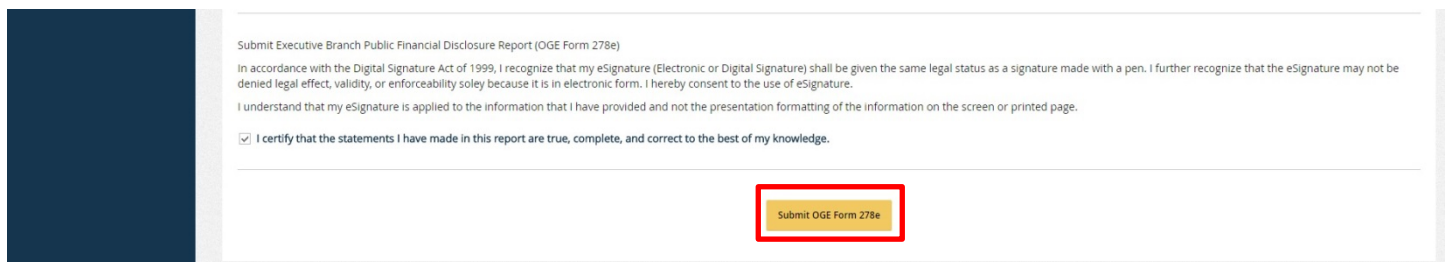
In accordance with the Digital Signature Act of 1999, I recognize that my eSignature (Electronic or Digital Signature) shall be given the same legal status as a signature made with a pen. I further recognize that the eSignature may not be denied legal effect, validity, or enforceability solely because it is in electronic form. I hereby consent to the use of eSignature.

I understand that my eSignature is applied to the information that I have provided and not the presentation formatting of the information on the screen or printed page.

☐ I certify that the statements I have made in this report are true, complete, and correct to the best of my knowledge.

Submit OGE Form 278e

6. Checking the box will enable the “Submit OGE Form 278e” button. Click the button.



Submit Executive Branch Public Financial Disclosure Report (OGE Form 278e)


In accordance with the Digital Signature Act of 1999, I recognize that my eSignature (Electronic or Digital Signature) shall be given the same legal status as a signature made with a pen. I further recognize that the eSignature may not be denied legal effect, validity, or enforceability solely because it is in electronic form. I hereby consent to the use of eSignature.

I understand that my eSignature is applied to the information that I have provided and not the presentation formatting of the information on the screen or printed page.

☒ I certify that the statements I have made in this report are true, complete, and correct to the best of my knowledge.

Submit OGE Form 278e

7. A message will display that the report has been submitted. You may now close the report.

Your Nominee Report has been signed. You may now close this window. 

From: [Monica M. G. Ashar](#)
To: "Jane Halprin"; [Heather A. Jones](#); [Kimberly L. Sikora Panza](#)
Cc: [Patrick Carney](#)
Subject: RE: Precleared: Ajit Pai
Date: Monday, March 13, 2017 10:08:35 AM

Thanks, Jane.

Referral to FCC



From: Heather A. Jones [<mailto:hajones@oge.gov>]
Sent: Monday, March 13, 2017 9:47 AM
To: Jane Halprin (b) (6) >; Kimberly L. Sikora Panza <klspanza@oge.gov>
Cc: Patrick Carney (b) (6) >; Monica M. G. Ashar <mmgashar@oge.gov>
Subject: RE: Precleared: Ajit Pai

Jane-

The Chairman's letter can not be on Commission letterhead because he is not acting in his official capacity but rather is acting in his personal capacity. Can you have him sign a letter that is not on letterhead? (also please don't include his personal address because the letter will be posted on the internet.)

Thanks,
Heather

Referral to FCC



From: Heather A. Jones [<mailto:hajones@oge.gov>]
Sent: Friday, March 10, 2017 2:22 PM
To: Jane Halprin (b) (6) >

Subject: RE: Precleared: Ajit Pai

Thanks.

Referral to FCC

From: Heather A. Jones [<mailto:hajones@oge.gov>]

Sent: Friday, March 10, 2017 9:33 AM

To: Jane Halprin <(b) (6)>; Patrick Carney <(b) (6)>

Cc: Kimberly L. Sikora Panza <klspanza@oge.gov>

Subject: FW: Precleared: Ajit Pai

278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>. 2 page attachment withheld in full - (b)(3), (4), (5), (6)

Jane and Patrick-

Can you get the Pai documents signed please?

Thanks,
Heather

From: Heather A. Jones

Sent: Wednesday, March 08, 2017 9:47 AM

To: Stefan Passantino <(b) (6)>

Cc: Ann Donaldson <(b) (6)>; David J. Apol; Deborah J. Bortot; Heather A. Jones; James D. Schultz <(b) (6)>; Rodrick T. Johnson; Sandra S. Mabry; Teresa L. Williamson; Kimberly L. Sikora Panza; <(b)(6) - Jane Halprin's email address>; <(b)(6) - Patrick Carney's email address>

Subject: Precleared: Ajit Pai

No attachment found in search

Stefan-

Ajit Pai was nominated yesterday and he has been precleared. I have attached his 278e signed on November 30, 2016 and an updated ethics agreement.

Thanks,
Heather

NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY)

PN89 — 115th Congress (2017-2018) — **Ajit Varadaraj Pai** — **Federal Communications Commission**

Ajit Varadaraj Pai, of Kansas, to be a Member of the Federal Communications Commission for a term of five years from July 1, 2016. (Reappointment)

Date Received from President: 03/07/2017

Committee: Commerce, Science, and Transportation

Latest Action: 03/07/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

Heather Jones

(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [EA Compliance](#)
To: (b)(6) - Jane Halprin's email address
Cc: [EA Compliance](#)
Subject: PAI EA - 90 Day Reminder - EA Certification Attached
Date: Thursday, October 05, 2017 4:03:42 PM
Attachments: [EA Certification \(June 2017 version\) - Member Pai - FCC.pdf](#)

EA certification available at [https://extapps2.oge.gov/2017/Presiden.nsl/64BDE46F310FA9E8852581FE00319309/\\$FILE/Pai%20EA%20Certification%201%20of%201.pdf](https://extapps2.oge.gov/2017/Presiden.nsl/64BDE46F310FA9E8852581FE00319309/$FILE/Pai%20EA%20Certification%201%20of%201.pdf)

Dear Ms. Halprin:

Mr. Ajit V. Pai was confirmed for the position of Member, Federal Communications Commission on October 2, 2017. This is a reminder that Member Pai has 90 days from the date of confirmation (October 2, 2017) to comply with the terms of his ethics agreement, unless an extension is granted by the Office of Government Ethics (OGE). Agency ethics officials do not have the authority to extend the compliance deadline; in rare circumstances of unusual hardship, OGE may decide to extend the deadline. See 5 C.F.R. § 2634.802(b). Please advise OGE via eacompliance@oge.gov as soon as possible if an extension will be requested.

Member Pai is required to complete and sign the attached Certification of Ethics Agreement Compliance (See OGE's Program Advisory [PA 17-03](#)). Member Pai should provide the completed and signed Certification to ethics officials as soon as possible but not later than January 2, 2018. The Certification should then be submitted to OGE no later than January 9, 2018, via email to eacompliance@oge.gov.

Thank you for your assistance in this matter, and please contact eacompliance@oge.gov if you have any questions. If you are not the point of contact for this matter, please advise eacompliance@oge.gov and forward this email to the appropriate ethics official.

Sincerely,

Compliance Division
United States Office of Government Ethics
1201 New York Avenue NW
Suite 500
Washington, DC 20005

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Kimberley H. Kaplan](#)
To: (b)(6) - James Schultz's email address
Cc: (b)(6) - Scott DeLaVega's email address; (b)(6) - Sandra Mabry's email address
Subject: Reed Cordish -- New Entrant report
Date: Friday, May 12, 2017 12:50:19 PM
Attachments: [OGE Comments on Cordish New Entrant Report.docx](#)

26 page attachment withheld in full - (b)(3), (4), (5), (6)

Jim,

I am the OGE reviewer for Mr. Cordish's New Entrant report. OGE's initial list of comments/questions regarding Mr. Cordish's report is attached.

Thanks,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Kimberley H. Kaplan](#)
To: ["Schultz, James D. EOP/WHO"](#)
Subject: RE: CORDISH
Date: Wednesday, July 19, 2017 10:47:44 AM

Thanks, Jim.

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Wednesday, July 19, 2017 9:51 AM
To: Kimberley H. Kaplan
Subject: RE: CORDISH

It has been submitted back to you for review. Thanks. J

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Kimberley H. Kaplan [<mailto:khkaplan@oge.gov>]
Sent: Tuesday, July 18, 2017 5:58 PM
To: Schultz, James D. EOP/WHO (b) (6) >
Subject: RE: CORDISH

Hi Jim,

He completed his divestitures of (b)(3), (6) last month and made edits to the report. The report is pending with WHCO. Once you re-submit it, we'll be able to continue on with our part.

Thanks!
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: >www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics<

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Tuesday, July 18, 2017 5:20 PM
To: Kimberley H. Kaplan
Subject: RE: CORDISH

Kim - where do we stand on Reed?

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o)
(m)

-----Original Message-----

From: Kimberley H. Kaplan [<mailto:khkaplan@oge.gov>]

Sent: Tuesday, May 30, 2017 8:54 AM

To: Schultz, James D. EOP/WHO (b) (6)

Cc: McAvoy, Ryan P. EOP/WHO (b) (6); Walsh, Michael <(b) (6)>

Subject: RE: CORDISH

Thanks, Jim. I will follow up with Ryan.

Best,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: >>www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics<<

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)

Sent: Monday, May 29, 2017 2:15 PM

To: Kimberley H. Kaplan

Cc: McAvoy, Ryan P. EOP/WHO; Walsh, Michael

Subject: RE: CORDISH

Hi Kim - I am asking Ryan McAvoy, who has joined us as a staff assistant to get this calendared for some time after 11 on Wednesday. Michael Walsh, who is personal counsel for Cordish, will also call in. Please let Ryan know what works. J

JAMES D. SCHULTZ

Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel

(b) (6) (o)
(b) (6) (m)

-----Original Message-----

From: Kimberley H. Kaplan [<mailto:khkaplan@oge.gov>]

Sent: Friday, May 26, 2017 3:33 PM

To: Schultz, James D. EOP/WHO (b) (6) >

Subject: RE: CORDISH

Jim,

Heather Jones and I would like to schedule a call with you for next week to discuss further Cordish (b)(3), (6). What is your availability on Tuesday or Wednesday?

Other comments from OGE are below --

(b)(3), (5), (6)



Thanks,
Kim

Kim H. Kaplan
Senior Government Ethics Specialist
U.S. Office of Government Ethics
(202) 482-9269 phone
(202) 482-9238 fax
khkaplan@oge.gov

Visit OGE's website: >>>www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics<<<

-----Original Message-----

From: Schultz, James D. EOP/WHO (b) (6)
Sent: Monday, May 22, 2017 2:27 PM
To: Kimberley H. Kaplan
Subject: CORDISH

2 page attachment withheld in full - (b)(3), (4), (5), (6); 15 page
attachment withheld in full - (b)(3), (4), (5), (6)

Kim - please see attached. I will be certifying the 278 shortly. J

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President Office of the White House Counsel
(b) (6) (o)

(b) (6) (m)

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This message contains Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This message may contain Controlled Unclassified Information (CUI) that requires safeguarding or dissemination control under applicable law, regulation, or Government-wide policy. This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Lorna A. Syme](#)
To: [Vincent Salamone](#)
Subject: FW: Cohn Reinvestment
Date: Wednesday, May 10, 2017 6:30:14 PM
Attachments: [image002.png](#)

1 page attachment withheld in full
(b)(3), (5), (6)

-----Original Message-----

From: Mullis, Dianna (b) (6)
Sent: Wednesday, May 10, 2017 6:15 PM
To: Lorna A. Syme
Subject: Re: Cohn Reinvestment

Lorna,

We need to make the (b)(3), (6) tomorrow. If we can't get the full list, could we get that one tonight?

Thanks very much. Feel free to call my cell at (b) (6).

Dianna

> On May 9, 2017, at 6:28 PM, Mullis, Dianna (b) (6) wrote:

>

> Lorna,

>

> Have you had a chance to take a look at the remaining funds? We crossed off (b)(3), (6) last week.

>

> Thank you.

>

> Dianna

>

> From: Mullis, Dianna

> Sent: Wednesday, May 03, 2017 5:28 PM

> To: Lorna A. Syme (lasyme@oge.gov)

> Subject: FW: Cohn Reinvestment

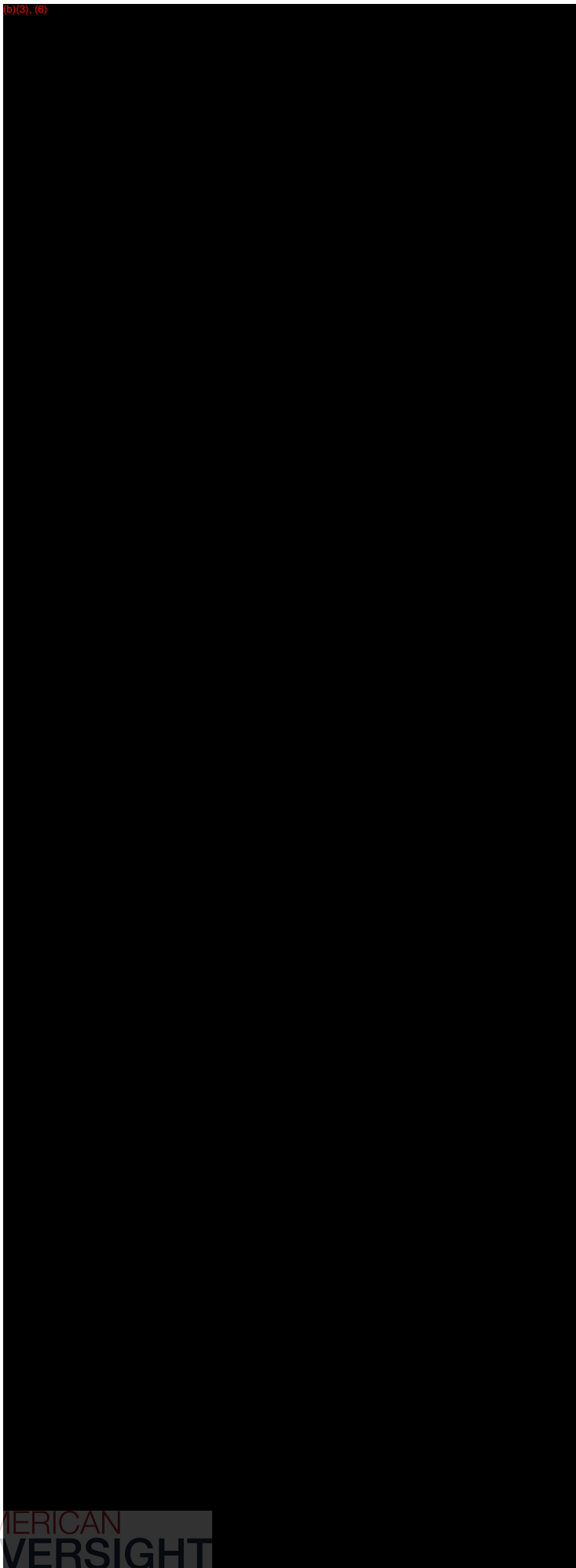
>

> Hi Lorna,

>

> I sent these to Jim late last week, but thought it might make sense to send them to you directly as well. (b)(3), (4), (5), (6)

[REDACTED]



>
>
>
> As noted below, (b) (5) Thanks so much.

> Dianna

> Dianna M. Mullis

> Associate

> dmullis@steptoe.com<(b) (6)>

> Steptoe

(b) (6) direct
(b) (6) cell
(b) (6) fax

>
> Steptoe & Johnson LLP
> 1330 Connecticut Avenue, NW
> Washington, DC 20036
> www.steptoe.com<<http://www.steptoe.com>>

>
>
>
> This message and any attached documents contain information from the law firm Steptoe & Johnson LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

>
>
> From: Schultz, James D. EOP/WHO (b) (6)]
> Sent: Monday, April 10, 2017 10:06 AM
> To: Mullis, Dianna
> Subject: FW: Cohn Reinvestment

> JAMES D. SCHULTZ

> Senior Associate Counsel and Special Assistant to the President Office
> of the White House Counsel

(b) (6) (o)
(b) (6) (m)

>
> From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
> Sent: Monday, April 10, 2017 10:05 AM
> To: Schultz, James D. EOP/WHO
> (b) (6)
> Cc: Deborah J. Bortot <djbortot@oge.gov<<mailto:djbortot@oge.gov>>>
> Subject: FW: Cohn Reinvestment

> Hi Jim:

>
>
>
>
>
> (b) (5)

>

(b) (5)

>

>

> Thanks!

>

> Lorna

>

>

> From: Deborah J. Bortot

> Sent: Wednesday, April 05, 2017 6:52 PM

> To: Lorna A. Syme

> Subject: FW: Cohn Reinvestment

>

> Lorna,

>

> Please take a look at these funds and contact Jim.

>

> Thanks,

> Deb

>

> From: Schultz, James D. EOP/WHO (b) (6)

> Sent: Wednesday, April 05, 2017 5:02 PM

> To: Deborah J. Bortot

> Subject: FW: Cohn Reinvestment

>

> Deb – who is the right person to deal with on this? Also, should I talk with you on a (b)(6)

>

> JAMES D. SCHULTZ

> Senior Associate Counsel and Special Assistant to the President Office

> of the White House Counsel

(b) (6) (o)
(m)

> From: Mullis, Dianna (b) (6)

> Sent: Wednesday, April 5, 2017 4:16 PM

> To: Schultz, James D. EOP/WHO

> (b) (6)

> Subject: Cohn Reinvestment

>

> Jim,

>

> Can you please ask OGE to confirm (b) (5), (b) (6)

(b)(3), (b) Our particular concern is with . Thank you.

>

> Best,

> Dianna

>

> [cid:image001.png@01D2AE23.FF7064D0]

>

> Dianna M. Mullis

> Associate

> (b) (6) >

> Steptoe

(b) (6)

direct

cell

> +1 202 429 3902 fax

>

> Steptoe & Johnson LLP

> 1330 Connecticut Avenue, NW

> Washington, DC 20036

> www.step toe.com<<http://www.step toe.com>>

>

>

>

> This message and any attached documents contain information from the law firm Steptoe & Johnson LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

>

>

>

>

>

> OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

> <image002.png>

From: [Vincent Salamone](#)
To: (b)(6) - Stefan Passantino's email address (b)(6) - James Schultz's email address (b)(6) - Sandra Mabry's email address
(b)(6) - Scott DeLaVega's email address
Subject: First round of comments - Cohn
Date: Tuesday, June 13, 2017 5:12:18 PM 4 page attachment withheld in full - (b) (3), (5), (6)
Attachments: [OGE Comments on Gary Cohn.docx](#)

I am the OGE reviewer for Gary Cohn's public financial disclosure report. I've completed my initial review of the report and the attached document contains my first round of comments.

I am also returning the filer's report to you in the Integrity system to allow you to make revisions as appropriate. Please let me know if you have any questions.

Thank you,

Vincent Salamone
U.S. Office of Government Ethics
Phone: (202) 482-9274

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Vincent Salamone](#)
To: [Vincent Salamone](#)
Subject: FW: GDC
Date: Monday, July 03, 2017 9:16:50 AM

-----Original Message-----

From: Deborah J. Bortot
Sent: Friday, January 13, 2017 2:30 PM
To: Vincent Salamone
Subject: FW: GDC

Vince,

Could you reach out to Bob?

Thanks,
Deb

-----Original Message-----

From: Rizzi, Robert (b) (6)]
Sent: Friday, January 13, 2017 12:17 PM
To: Deborah J. Bortot
Subject: GDC

Deb-have you gotten any input regarding Gary Cohn from Don McGahn? We understand that this is a priority for the transition but not sure how this is being handled. We would be happy to help move this as quickly as we can.
Thanks.

Bob Rizzi
Steptoe & Johnson LLP
Washington Office

(b) (6) (direct)
(b) (6) (cell)

From: [Schultz, James D. EOP/WHO](#)
To: [Vincent Salamone](#)
Subject: Responses to OGE Comments (7-10-17)
Date: Monday, July 10, 2017 4:13:37 PM
Attachments: [Responses to OGE Comments \(7-10-17\).docx](#)

5 page attachment withheld in full - (b)(3), (5), (6)

Attached please find the responses to your inquiries and comments. J

From: [Schultz, James D. EOP/WHO](#)
To: [Lorna A. Syme](#)
Subject: FW: OGE Comments/Questions on CD request and New Entrant Report - Powell
Date: Thursday, March 09, 2017 9:12:02 AM
Attachments: [Powell Responses to OGE \(3-9-17\) \(2\).docx](#)

6 page attachment withheld in full - (b)(4), (5), (6)

Please see attached. Jim

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6)
(o)
(m)

From: Mullis, Dianna [mailto:(b) (6)]
Sent: Thursday, March 9, 2017 9:04 AM
To: Schultz, James D. EOP/WHO (b) (6) >
Cc: Swartz, Christopher J. EOP/WHO (b) (6) >
Subject: RE: OGE Comments/Questions on CD request and New Entrant Report - Powell

Jim,

Attached please find our responses to OGE's questions.

No attachment found in search

Best,
Dianna

Dianna M. Mullis
Associate

(b) (6)

Step toe

(b) (6) direct
(b) (6) cell
+1 202 429 3902 fax
Step toe & Johnson LLP
1330 Connecticut Avenue, NW
Washington, DC 20036
www.step toe.com

This message and any attached documents contain information from the law firm Step toe & Johnson LLP that may be confidential and/or privileged. If you are not the intended recipient, please do not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.

From: Schultz, James D. EOP/WHO [mailto:(b) (6)]
Sent: Monday, March 06, 2017 12:46 PM
To: Mullis, Dianna
Subject: FW: OGE Comments/Questions on CD request and New Entrant Report - Powell

Can you review, please. J

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6) o)
m)

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Wednesday, March 1, 2017 11:19 AM
To: Schultz, James D. EOP/WHO (b) (6) >
Subject: OGE Comments/Questions on CD request and New Entrant Report - Powell

Hi Jim,

No attachment found in search

I am the OGE reviewer for Dina Powell's Certificate of Divestiture request and new entrant financial disclosure report. I've completed my initial review of the report and certificate of divestiture and have attached my comments. Please let me know if you have any questions or would like to discuss.

Thank you,

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error,

From: [Mullis, Dianna](#)
To: [Lorna A. Syme](#)
Subject: RE: Powell
Date: Friday, March 10, 2017 5:28:33 PM
Attachments: [Powell Responses to OGE Follow Up \(3-10-17\) \(2\).docx](#)

2 page attachment withheld in full - (b)(4), (5), (6)

Hi Lorna,

I can confirm that the (b)(5), (6)

Attached please find responses to your questions below. We are still tracking down information regarding the (b) (6)

Dianna

From: Lorna A. Syme [mailto:lasyme@oge.gov]
Sent: Thursday, March 09, 2017 6:32 PM
To: Mullis, Dianna
Subject: Powell

Dianna:

I know you are confirming the notational allocation issue. These are my other questions – I thought it might be more useful to email them to you. Let me know if you still want to talk at 10am tomorrow or if you wish to look these over and talk later in the day (or feel free to respond by email).

(b)(5), (6)

Thank you,

Lorna

Lorna Syme

From: [Lorna A. Syme](#)
To: (b)(6) - Christopher Swartz's email address
Subject: FW: Powell
Date: Thursday, March 30, 2017 11:35:39 AM

Chris:

I am returning the Powell report (Jim returned it to me last night). I had returned it to Stefan on 3/16 and Dianna from Steptoe has indicated that she is willing to make the changes (I had worked with her on questions regarding the CD/278e).

Thanks!
Lorna

From: Mullis, Dianna [mailto:(b) (6)]
Sent: Thursday, March 16, 2017 10:57 AM
To: Lorna A. Syme; (b)(6) - James Schultz's email address
Subject: RE: Powell

Thanks, Lorna. We will make those changes and let you know when they are complete.

Jim – Let me know if you want to make the changes on your end (in which case I will send you details and language), or if we can access the report to do so.

Dianna

From: Lorna A. Syme [<mailto:lasyme@oge.gov>]
Sent: Thursday, March 16, 2017 10:50 AM
To: (b)(6) - James Schultz's email address; Mullis, Dianna
Subject: Powell

Jim and Dianna:

I just returned the Powell report to Stefan in Integrity. This will allow you to access the report and make changes.

(b)(5), (6)



Please let me know when you have made the changes to the report in Integrity. This will allow me to review the revised report before you send it back to OGE.

Thanks, and please let me know if you have any questions.

Lorna

From: [Lorna A. Syme](#)
To: (b)(6) - Scott DeLaVega's email address; "Mabry, Sandra S. EOP/WHO"; "Schultz, James D. EOP/WHO"
Subject: RE: Dina Powell - new entrant report
Date: Wednesday, July 05, 2017 1:08:10 PM

Any update on the status of our questions for Ms. Powell's report?

Thanks.
Lorna

From: Lorna A. Syme
Sent: Tuesday, May 09, 2017 12:29 PM
To: (b)(6) - Scott DeLaVega's email address; 'Mabry, Sandra S. EOP/WHO'
Subject: FW: Dina Powell - new entrant report

3 page attachment withheld in full -
(b)(5), (6)

Just checking the status.

Thanks!
Lorna

From: Lorna A. Syme
Sent: Monday, April 24, 2017 3:11 PM
To: (b)(6) - Scott DeLaVega's email address; 'Mabry, Sandra S. EOP/WHO'; (b)(6) - James Schultz's email address
Subject: FW: Dina Powell - new entrant report

3 page attachment withheld in full -
(b)(5), (6)

Good Afternoon:

Just checking the status of the questions we sent regarding Dina Powell's new entrant report.

Thank you.

Lorna

From: Lorna A. Syme
Sent: Thursday, April 13, 2017 12:15 PM
To: (b)(6) - Scott DeLaVega's email address; (b)(6) - James Schultz's email address
Subject: Dina Powell - new entrant report

3 page attachment withheld in full -
(b)(5), (6)

Jim and Scott:

Our Director has reviewed the new entrant report for Dina Powell. We will need responses to the attached questions. We will also require some revisions to the report (also discussed in the attached document).

Thanks!

Lorna

From: [Schultz, James D. EOP/WHO](#)
To: [Lorna A. Syme](#)
Subject: Powell Responses
Date: Wednesday, July 12, 2017 1:43:43 PM
Attachments: [DP RESPONSES TO OGE QUESTIONS 7-11 pdf.pdf](#)

4 page attachment withheld in full
- (b)(4), (5), (6)

Lorna - Please find the dina Powell response. J

JAMES D. SCHULTZ
Senior Associate Counsel and Special Assistant to the President
Office of the White House Counsel

(b) (6)
(o)
(m)

From: [Lorna A. Syme](#)
To: ["Schultz, James D. EOP/WHO"](#)
Subject: Dina Powell
Date: Wednesday, August 30, 2017 11:53:33 AM

Jim:

Please forward the report to us.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: [>>www.oge.gov<<](http://www.oge.gov)
Follow OGE on Twitter: @OfficeGovEthics



U.S. SMALL BUSINESS ADMINISTRATION
WASHINGTON, DC 20416

OFFICE OF GENERAL COUNSEL

April 17, 2019

Austin R. Evers
American Oversight
1030 15th Street, NW, Suite B255
Washington, DC 20005

Re: SBA 2018-000878

Dear Mr. Evers,

This letter is in response to your Freedom of Information Act ("FOIA") request originating with the Office of Government Ethics, (OGE) request no. 17/237, which has been referred to the Small Business Administration ("SBA"), request no. SBA-2018-000878, in which you have requested the following:

1. "Records containing or reflecting communications between OGE and individuals nominated, or anticipated to be nominated, by President Trump for Senate-confirmed positions in the federal government, including communications with attorneys or agents acting on behalf of such nominees or prospective nominees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such nominees or prospective nominees.
2. Records containing or reflecting communications between OGE and individuals appointed, or anticipated to be appointed, by President Trump for positions in the Executive Office of the President in the White House, including communications with attorneys or agents acting on behalf of such appointees or prospective appointees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such appointees or prospective appointees."

The OGE performed a diligent search of its records and after redacting material, released documents to you and referred a number of documents to SBA for its review prior to release. SBA is releasing the attached documents, which include OGE's redactions along with SBA's redactions. Redactions have been made by SBA, pursuant to FOIA Exemptions 4, 5 and 6. Exemption 4 protects material which are trade secrets and commercial or financial information obtained from a person that is privileged or confidential. This includes business information which if released could be competitively harmful. Exemption 5 protects internal communications that are pre-decisional and deliberative. Exemption 6 protects information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would

constitute a clearly unwarranted invasion of personal privacy.” The redacted information consists of personal email addresses and personal cell phone numbers and business information.

SBA has also withheld in full the United States Senate Small Business Committees Questions to Presidential Nominees and Ms. McMahon’s answers. These are being withheld pursuant to Exemptions 4, 5 and 6.

If you are dissatisfied with the Agency’s decision, you may file an administrative appeal within 90 days of the date of this letter to:

Office of Hearings and Appeals
Attention: Delorice Ford, FOIA Officer
409 3rd Avenue, SW – 8th Floor
Washington, DC 20416

If you are unable to resolve your FOIA dispute through our FOIA Public Liaison in the Office of Hearings and Appeals, the Office of Government Information Services (OGIS), the Federal FOIA Ombudsman’s office, offers mediation services to help resolve disputes between FOIA requesters and Federal agencies. The contact information for OGIS is:

Office of Government Information Services
National Archives and Records Administration
8601 Adelphi Road--OGIS
College Park, MD 20740-6001
ogis@nara.gov
ogis.archives.gov
202-741-5770
877-684-6448

Sincerely,



Eric S. Benderson
Associate General Counsel for Litigation
Office of General Counsel
U.S. Small Business Administration

From: [McIntyre-Barnes, Marilyn E.](#)
To: [Rachel K. Dowell](#)
Cc: [Gangwere, Robert L.](#)
Subject: RE: Nominee Report
Date: Friday, December 16, 2016 3:10:15 PM

Rachel,

Thank you for your comments and the document attachment. Once we have completed our review and preliminary edits of the Report, Robert will contact you to discuss our progress and his conflicts analysis. Have a wonderful weekend!

Marilyn E. McIntyre-Barnes
Government Ethics Specialist
Office of General Counsel
U.S. Small Business Administration
Phone: (202) 205-6639

From: Rachel K. Dowell [mailto:rkdownell@oge.gov]
Sent: Thursday, December 15, 2016 2:54 PM
To: McIntyre-Barnes, Marilyn E.
Subject: FW: Nominee Report

From: Rachel K. Dowell
Sent: Thursday, December 15, 2016 2:52 PM
To: (b)(6) - Marilyn Barnes's email address
Cc: (b)(6) - Robert Gangwere's email address; Teresa L. Williamson
Subject: Nominee Report

No attachment found in search

Hi Marilyn,

My initial questions/edits are included below (I'm also attaching examples of what to report and where, which may help in confirming that the report captures all reportable items). Let me know if you'd like to discuss any of these comments. As for the conflicts analysis, let's set up a time to discuss after you've had a chance to review.

A couple of administrative items: In case I'm ever out of the office during this review process, my backup is Patrick Lightfoot, 202-482-9271. Also, if you are having any issues on your end (e.g., responsiveness of filer, complicated conflicts analysis, complex assets, etc.), please let me know ASAP so that I can set expectations with the Transition Team and help keep this report moving.

Thanks!

Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
(202) 482-9267
Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

(b) (5)

[REDACTED]

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Deborah J. Bortot](#)
To: (b)(6) - Robert Gangwere's email address
Cc: [Rachel K. Dowell](#)
Subject: Linda McMahon
Date: Wednesday, December 28, 2016 3:58:14 PM

Robert,

Rachel Dowell provided comments on this report 12/15/16. None of the comments have been addressed in *Integrity*. As you know, this report is a top priority. Is there anything we can do to move this report along?

Thanks,
Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

From: [Emory A. Rounds III](#)
To: [Rachel K. Dowell](#)
Subject: FW: POC for McMahon
Date: Friday, December 30, 2016 10:43:56 AM

FYI...

From: Cooper Smith (b) (6)
Sent: Friday, December 30, 2016 10:43 AM
To: Emory A. Rounds III
Subject: POC for McMahon

Hey Emory-

To contact Ms. McMahon, first try her personal cell (b) (6), and if she doesn't answer that you can call her assistant Donna at (b) (6)

Coop

From: [Gangwere, Robert L.](#)
To: [Rachel K. Dowell](#)
Subject: Nominee Public Financial Disclosure Report (form 278e)
Date: Friday, December 30, 2016 12:57:58 PM
Attachments: [Technical Review and Questions.docx](#)

FYI

From: Gangwere, Robert L.
Sent: Friday, December 30, 2016 11:56 AM
To: (b) (6)
Subject: Nominee Public Financial Disclosure Report (form 278e)

Ms. McMahon,

My name is Robert Gangwere and I am the Designated Agency Ethics Official for the U.S. Small Business Administration. As such, I am required to review and certify your draft 278e report before it is certified by the Director of the U.S. Office of Government Ethics (OGE) as part of the nomination process.

I tried calling your office this morning but I understand that you are not available today. However, your assistant, Donna, was kind enough to confirm your e-mail address and suggest that I contact you today by e-mail.

In order to expedite the review process, I have attached a document that contains questions and corrections from OGE and from us pertaining to your draft 278e report. I would like to go over it with you orally (or with your representative) as soon as it is convenient. I will be in the office on Tuesday, January 3; or you can get a hold of me prior to Tuesday by using my personal cell number, (b) (6)

I look forward to talking to you.

Robert Gangwere
DAEO, SBA
(b) (6)

From: [Gangwere, Robert L.](#)
To: [Patrick J. Lightfoot](#)
Cc: [Rachel K. Dowell](#)
Subject: McMahon 278e
Date: Wednesday, January 04, 2017 8:21:28 AM

Patrick,

I had read these when they first came out but had forgotten the particulars. However, after reading them again I believe they clearly support the proposition that if the hedge funds qualify as EIFs, disclosure of the underlying assets and a conflict analysis of those assets is not required. My contact person at Morgan Stanley, (b) (5), has already confirmed that they are all EIFs and she has so indicated on the draft 278e. Based on my conversation with her and the application of the EIF definition, I agree with her assessment.

Robert

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, January 03, 2017 3:39 PM
To: Gangwere, Robert L.
Cc: Rachel K. Dowell
Subject: RE: McMahon 278e

Robert,

Below are the links to the two legal advisories we have re: (b) (5)

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I will update Rachel on the other aspects of the call first thing tomorrow morning. Thanks!

--Patrick

From: Gangwere, Robert L. [<mailto:robert.gangwere@sba.gov>]
Sent: Tuesday, January 03, 2017 12:33 PM
To: Patrick J. Lightfoot
Subject: McMahon 278e

Patrick,

No time has been set. She is in Washington, D.C. today and was not sure when she would be available, so she is going to call me sometime late this afternoon.

If you have specific questions you want me to ask her (beyond what Rachel has already sent me), please forward them to me a.s.a.p.

Robert

From: Patrick J. Lightfoot [<mailto:pjlightf@oge.gov>]
Sent: Tuesday, January 03, 2017 10:54 AM
To: Gangwere, Robert L.
Cc: Sandra S. Mabry; Rachel K. Dowell
Subject: RE: McMahon 278e

Hi Robert,

I'm Rachel's backup for nominee reports while she is out of the office today. Sandy Mabry and I would like to participate in the call this afternoon to help expedite things. What time were you planning to touch base with Ms. McMahon?

Sincerely,

--

Patrick J. Lightfoot
Assistant Counsel, Ethics Law & Policy Branch
General Counsel & Legal Policy Division

U.S. Office of Government Ethics
1201 New York Ave NW, Suite 500
Washington, DC 20005
Telephone: (202) 482-9271

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: Gangwere, Robert L. [<mailto:robert.gangwere@sba.gov>]
Sent: Tuesday, January 03, 2017 8:40 AM
To: Rachel K. Dowell
Cc: Deborah J. Bortot
Subject: McMahon 278e

Rachel,

I received a call from Ms. McMahon's personal assistant, Donna, this morning and she told me that Ms. McMahon and her CPA went over our questions and corrections this last weekend and they have already made some changes and corrections to the 278e. Ms. McMahon is going to try to call me this afternoon to go over the remaining issues.

I am hoping to hear from all of our program offices regarding the vetting of Ms. McMahon's assets by Thursday morning. That should allow me to draft an ethics agreement on Friday.

Robert

From: Rachel K. Dowell [<mailto:rkdowell@oge.gov>]
Sent: Friday, December 30, 2016 9:46 AM
To: Gangwere, Robert L.
Subject: FW: POC for McMahon

Here you go! Let me know once you have made contact/sent questions over to either her or whoever she identifies as her representative.

Rest of chain mentioned above



From: [Gangwere, Robert L.](#)
To: [Rachel K. Dowell](#)
Subject: Senate Questionnaire
Date: Thursday, January 05, 2017 1:56:36 PM
Attachments: [Linda McMahon's Draft Senate Questionnaire.pdf](#)

Rachel,

Here's her questionnaire – there are some inconsistencies that we need to discuss.

Robert

From: [Gangwere, Robert L.](#)
To: [Sundberg, Susan L.](#); [Rachel K. Dowell](#)
Subject: FW: 278e -- Final questions and corrections
Date: Friday, January 06, 2017 2:15:01 PM
Attachments: [Final Questions and Corrections -- McMahon 278e.docx](#)

FYI

From: Lattner, Paul H. (b) (6)
Sent: Friday, January 06, 2017 1:07 PM
To: Gangwere, Robert L.
Cc: McIntyre-Barnes, Marilyn E.
Subject: RE: 278e -- Final questions and corrections

4 page attachment withheld in full - (b)(3),
(4), (5), (6)

Robert,

Attached are responses to yesterday's questions, see text in italics.

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)

D (b) (6)

F 412-355-6501

From: Gangwere, Robert L. [<mailto:robert.gangwere@sba.gov>]
Sent: Thursday, January 05, 2017 9:58 AM
To: Lattner, Paul H.
Cc: McIntyre-Barnes, Marilyn E.
Subject: 278e -- Final questions and corrections

Paul,

Attached is the document I mentioned on the phone. After you have had a chance to review it, please give me a call at (b) (6)

Robert

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6)

From: [Gangwere, Robert L.](#)
To: [Rachel K. Dowell](#)
Subject: Ethics Agreement
Date: Friday, January 06, 2017 3:29:36 PM
Attachments: [My Draft Ethis Agreement.docx](#)

Rachel,

Here it is...

From: [Rachel K. Dowell](#)
To: ["Gangwere, Robert L."; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.](#)
Subject: RE: Add'l questions
Date: Tuesday, January 10, 2017 10:55:35 AM
Attachments: [Draft EA - McMahon - 1.10.17.docx](#)

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi all,

Please find attached my edits to the Ethics Agreement (EA) based on the most recent version of the 278. It has not been cleared yet, so please do not share this draft with the nominee. Please provide me with any edits or corrections you have to the EA, and I will move that forward for clearance.

With regard to the 278 (and related issues that I need for my notes), I think we are very close! Here are my pending questions/edits. Please let me know when the form has been updated and send back answers as soon as possible.

(b)(3), (5), (6)

(b) (3), (5), (6)



Thanks!
Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
(202) 482-9267

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

(b) (5)



Robert

From: Lattner, Paul H. (b) (6)
Sent: Friday, January 06, 2017 4:19 PM
To: Gangwere, Robert L.
Subject: re: Add'l questions

Robert,

(b) (3), (4), (5), (6)

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)

D (b) (6)

F 412-355-6501

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6)

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Cc: [Sundberg, Susan L.](#); [McIntyre-Barnes, Marilyn E.](#); [Gangwere, Robert L.](#)
Subject: RE: Add'l questions
Date: Tuesday, January 10, 2017 2:24:58 PM

Rachel,

I've made the requested changes to Form 278.

(b)(3), (5), (6)

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)

D

F 412-355-6501

Rest of chain mentioned above

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Subject: RE: Update
Date: Thursday, January 12, 2017 12:48:41 PM

Rachel,

(b)(3), (5), (6)



K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613
(b)(6)
D (b)(6)
F 412-355-6501

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Thursday, January 12, 2017 11:04 AM
To: Lattner, Paul H.
Subject: RE: Update

(b)(3), (4), (5), (6)



From: Lattner, Paul H. (b)(6)
Sent: Thursday, January 12, 2017 10:11 AM

To: Rachel K. Dowell; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.
Cc: Gangwere, Robert L.
Subject: RE: Update

To all,

Per our discussion yesterday, I've made the following changes to Form 278:

(b)(3), (5), (9)



K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)

(b) (6)

F 412-355-6501

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at

(b) (6)

-4

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#); [Sundberg, Susan L.](#) (b) (6); [McIntyre-Barnes, Marilyn E.](#)
Cc: [Mooney, Scott E.](#)
Subject: Re: (b) (3), (b) (6)
Date: Thursday, January 12, 2017 1:31:43 PM

(b) (3), (4), (5), (6)

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613
(b) (6)
D (b) (6)
F 412-355-6501

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6)

From: [Mooney, Scott E.](#)
To: [Rachel K. Dowell](#)
Subject: RE: mcMahon letter
Date: Thursday, January 12, 2017 3:55:48 PM

You're welcome. Thank you for the quick response. We'll send to Linda's assistant, Donna Letizia, right away.

We will request that Donna email a pdf of the signed letter to you as soon as the letter is signed. We understand that they will be able to sign today, but we don't know when.



Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b) (6)

Fax: 412-355-6501

(b) (6)

www.klgates.com

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]

Sent: Thursday, January 12, 2017 3:53 PM

To: Mooney, Scott E.

Subject: RE: mcMahon letter

Thank you! That's exactly what we were looking for. You can send for signature.

From: Mooney, Scott E. (b) (6)
Sent: Thursday, January 12, 2017 3:06 PM
To: Rachel K. Dowell
Subject: RE: mcmahon letter

Hello, Rachel.

1 page attachment withheld in full - (b)(3), (4), (5), (6)

Attached is your requested draft letter from the McMahons re (b)(3), (6). Please let me know if you'd like to discuss further or when I should send to the McMahons for signature.

K&L GATES

Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b) (6)

Fax: 412-355-6501

(b) (6)

www.klgates.com

From: Rachel K. Dowell [<mailto:rkdownell@oge.gov>]
Sent: Thursday, January 12, 2017 1:43 PM
To: Mooney, Scott E.
Subject: RE: mcmahon letter

Hi Scott,

(b)(3), (5), (6)

Thanks!
Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
(202) 482-9267

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

From: Mooney, Scott E. (b) (6)
Sent: Thursday, January 12, 2017 1:41 PM
To: Rachel K. Dowell
Subject: mcmahon letter

Rachel,

We are proceeding with the draft letter that you requested. Could you confirm that it should
(b)(3), (5), (6) ?

K&L GATES

Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b) (6)

Fax: 412-355-6501

(b) (6)

www.klgates.com

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6) -4

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying,

From: [Mooney, Scott E.](#)
To: [Rachel K. Dowell](#)
Subject: status of letter
Date: Thursday, January 12, 2017 4:45:49 PM

Hello, again.

I just received word that it is likely that you will not be receiving a copy of the signed (b)(3), (6) letter until tomorrow morning (due to Linda's schedule of meetings tonight).

Do you have any sense for how long it will take for OGE to circulate the conflicts letter for Linda's signature once you receive a copy of the signed (b)(3), (6) letter?



Scott E. Mooney

K&L Gates LLP

K&L Gates Center

210 Sixth Avenue

Pittsburgh, PA 15222

Phone: (b)(6)

Fax: 412-355-6501

(b)(6)

www.klgates.com

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b)(6).

From: [Donna Letizia](#)
To: ["McDevitt, Jerry"](#); [Rachel K. Dowell](#)
Cc: [PAUL LATTNER](#); ["Mooney, Scott E."](#)
Subject: Linda E. McMahon (b)(3), (6); Linda E. McMahon (b)(3), (6)
Date: Thursday, January 12, 2017 7:23:20 PM
Attachments: [Linda McMahon.pdf](#) 2 page attachment withheld in full - (b)(3), (4), (5), (6)
[Vincent McMahon.pdf](#)

As requested, the attached letters are signed by Linda and Vincent McMahon.

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Subject: re: Q2
Date: Friday, January 13, 2017 1:23:36 PM

Rachel,

(b)(3), (5), (6)



K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613

(b) (6)




D

(b) (6)



F 412-355-6501

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6)



From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#)
Cc: [Mooney, Scott E.](#)
Subject: re:
Date: Friday, January 13, 2017 2:54:17 PM

Rachel,

I've updated the position in Part 1, Line 6 for (b)(3), (b)(6)

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613
(b) (6)
D (b) (6)
F 412-355-6501

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6).

From: [Rachel K. Dowell](#)
To: [Deborah J. Bortot](#); [Heather A. Jones](#)
Subject: FW: EA and follow-up questions
Date: Friday, January 13, 2017 8:27:22 PM
Attachments: [EA for preclearance \(McMahon, 1.13.17\).docx](#)
[Notes for preclearance \(McMahon, 1.13.17\).docx](#)
[Linda McMahon.pdf](#)
[Vincent McMahon.pdf](#)

12 page attachment withheld in full - (b)(3), (4), (5), (6)

Hi Deb & Heather,

All follow-up edits to Ms. McMahon's report have now been made in Integrity. EA, notes, and letters to the [REDACTED] are attached (hard copies with the folder). Please let me know if you need anything else. I am out on Tuesday but will be checking my email and my phone will forward to my cell.

Thanks!
Rachel

From: Shum, Kitty (b) (6)
Sent: Friday, January 13, 2017 6:07 PM
To: Rachel K. Dowell
Cc: Paul H. Lattner (b) (6); (b) (6) - Robert Gangwere's email address; (b) (6) - Susan Sundberg's email address; (b) (6) - Marlyne Barrie's email address
Subject: RE: EA and follow-up questions

Rachel,

As per our conversations today, please note that the following have been amended/corrected as requested.

Item # 2- information requested has been added.

Item # 3- After your clarification, we have made the necessary adjustments for previous entries.

(b)(3), (5), (6)

Please let me know if you have any further questions or concerns.

If you need to reach me, please contact my personal cell phone at (b) (6)

Regards,

Kitty Shum

Sr. Reg'd Service Associate
Morgan Stanley Wealth Management
1290 Avenue of the Americas
New York, NY 10104
Phone: (b) (6)
Fax: 212-705-4556

From: Rachel K. Dowell [<mailto:rkdownell@oge.gov>]
Sent: Thursday, January 12, 2017 5:54 PM
To: 'Gangwere, Robert L.'; Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.
Cc: Mooney, Scott E.; Lattner, Paul H.
Subject: EA and follow-up questions

Hi everyone,

At this point, we can share the Ethics Agreement with Ms. McMahon, but she should not sign it yet and it is subject to change once our Director reviews it (hopefully tomorrow, pending the answers of a few follow-up questions below). Ms. McMahon is also expected to sign the attached statement shortly re: (b)(3), (6).

Upon review, we had a few very minor follow-up questions/edits that can hopefully be addressed tomorrow morning:

(b)(3), (5), (6)



Once I have answers to the follow-up questions, I will continue moving this report forward.

Thanks all!
Rachel

--

Rachel K. Dowell
Assistant Counsel
Office of Government Ethics
General Counsel & Legal Policy Division
Ethics Law and Policy Branch
(202) 482-9267

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at (b) (6) .-4

NOTICE: Morgan Stanley is not acting as a municipal advisor and the opinions or views contained herein are not intended to be, and do not constitute, advice within the meaning of Section 975 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. If you have received this communication in error, please destroy all electronic and paper copies and notify the sender immediately. Mistransmission is not intended to waive confidentiality or privilege. Morgan Stanley reserves the right, to the extent permitted under applicable law, to monitor electronic communications. This message is subject to terms available at the following link: <http://www.morganstanley.com/disclaimers> If you cannot access these links, please notify us by reply message and we will send the contents to you. By communicating with Morgan Stanley you consent to the foregoing and to the voice recording of conversations with personnel of Morgan Stanley.

From: [Deborah J. Bortot](#)
To: [Heather A. Jones](#); (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barnes's email address; (b)(6) - Robert Gangwere's email address
Cc: [Rachel K. Dowell](#); [David J. Apol](#)
Subject: RE: McMahon - Can someone give me a call about a conflicts question?
Date: Saturday, January 14, 2017 1:02:13 PM

Robert, Susan, Marilynne,

(b)(3), (5), (6)

Thanks,
Deb

From: Heather A. Jones
Sent: Saturday, January 14, 2017 11:03 AM
To: (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barnes's email address; (b)(6) - Robert Gangwere's email address
Cc: Deborah J. Bortot; Rachel K. Dowell
Subject: McMahon - Can someone give me a call about a conflicts question?

I have a question about one of the assets that was added yesterday. You can reach me at

(b)(6)

Also I have the following notes on the report, all on Part 6:

(b)(3), (5), (6)

Please let me know if you have any questions.

Thanks,
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

From: [Emory A. Rounds III](#)
To: ["James Carroll"](#)
Subject: RE: McMahon
Date: Monday, January 16, 2017 1:38:06 PM

[Rachel Dowell @ 202-482-9267](#), but if she is not in today – the holiday – maybe Deb Bortot @ 202-482-9227 . . .

From: James Carroll (b) (6)
Sent: Monday, January 16, 2017 1:36 PM
To: Emory A. Rounds III
Subject: McMahon

Do you know who is her OGE contact? They are trying to reach him/her

From: [Lattner, Paul H.](#)
To: [Rachel K. Dowell](#); [Heather A. Jones](#); [Deborah J. Bortot](#); "Shum, Kitty"; [REDACTED]
Subject: RE: McMahon - A couple of questions
Date: Monday, January 16, 2017 3:52:35 PM

Rachel,

I reviewed the changes and they are correct.

K&L GATES

Paul H. Lattner
Tax Manager
K&L Gates LLP
K&L Gates Center
210 Sixth Avenue
Pittsburgh, PA 15222-2613
[REDACTED]
D [REDACTED]
F 412-355-6501

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Monday, January 16, 2017 3:30 PM
To: [Heather A. Jones](#); [Deborah J. Bortot](#); [Lattner, Paul H.](#); "Shum, Kitty";
[REDACTED]
Subject: FW: McMahon - A couple of questions

Hi everyone,

Please see the answers in red below. I made the changes in Integrity per Paul's instructions, and he is going to confirm by replying to this email that my corrections are correct. [REDACTED]

[REDACTED]

Thanks,

Rachel

From: Heather A. Jones

Sent: Sunday, January 15, 2017 11:15 AM

To:

(b)(6) - Paul Lathier's email address

(b)(6) - Kitty Shum's email address

Cc:

(b)(6) - Robert Gangwere's email address

(b)(6) - Susan Sundberg's email address


(b)(6) - Marilynne Barnes's email address

Deborah J. Bortot; Rachel K. Dowell

Subject: McMahon - A couple of questions

Hello-

I have been working with Rachel on Ms. McMahon's report. We have a few outstanding items on the report after the changes on Friday and one question. (b)(3), (b), (6)



The notes on the report all relate to Part 6.



Please let me know if you have any questions and thanks so much for your assistance,
Heather

Heather Jones

Senior Counsel

U.S. Office of Government Ethics

(202) 482-9316

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

This electronic message contains information from the law firm of K&L Gates LLP. The contents may be privileged and confidential and are intended for the use of the intended addressee(s) only. If you are not an intended addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this e-mail in error, please contact me at [REDACTED].

From: [Heather A. Jones](#)
To: ["Ann M. Donaldson"](#)
Cc: [Deborah J. Bortot](#); [David J. Apol](#); [Director of OGE](#); [Sandra S. Mabry](#); [Rodrick T. Johnson](#); [Teresa L. Williamson](#); [Emory A. Rounds III](#); [Rachel K. Dowell](#); (b)(6) - Robert Gangwere's email address; (b)(6) - Susan Sunberg's email address; (b)(6) - Marynne Barnes's email address
Subject: Preclearance: Linda McMahon
Date: Monday, January 16, 2017 5:12:01 PM
Attachments: [Revised final ethics agreement.docx](#)

Annie, [Linda McMahon](#) is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](#)

From: [Rachel K. Dowell](#)
To: [Heather A. Jones](#)
Subject: RE: Preclearance: Linda McMahon
Date: Monday, January 16, 2017 5:25:55 PM

Can you give me a call when you have a chance? (b) (6). Thanks!

From: Heather A. Jones
Sent: Monday, January 16, 2017 5:12 PM
To: 'Ann M Donaldson'
Cc: Deborah J. Bortot; David J. Apol; Director of OGE; Sandra S. Mabry; Rodrick T. Johnson; Teresa L. Williamson; Emory A. Rounds III; Rachel K. Dowell; (b)(6) - Robert Gangwere's email address; (b)(6) - Susan Sundberg's email address; (b)(6) - Marilynne Barnes's email address;
Subject: Preclearance: Linda McMahon

2 page attachment withheld in full - (b)(3), (4), (5), (6)

Annie, [Linda McMahon](#) is precleared. I have attached the ethics agreement.

Thanks!
Heather

Heather Jones
(202) 482-9316
Office of Government Ethics

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: [@OfficeGovEthics](https://twitter.com/OfficeGovEthics)

From: [Deborah J. Bortot](#)
To: (b)(6) - Robert Gangwere's email address
Subject: McMahon Ethics Agreement
Date: Monday, January 16, 2017 6:49:06 PM
Attachments: [Revised final ethics agreement.docx](#)

2 page attachment withheld in full - (b)(3), (4), (5), (6)

See attached

From: [Director of OGE](#)
To: [Rachel K. Dowell](#); [Director of OGE](#); [Deborah J. Bortot](#); [David J. Apol](#); [Heather A. Jones](#)
Subject: RE: need some action from nominee
Date: Monday, January 16, 2017 8:15:25 PM

Just tell her to have it to us any time tonight or early tomorrow morning. We'll send it to the Senate by 10:00 a.m. There's no over there anyway.

Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

Telephone: 202.482.9292
Email: walter.shaub@oge.gov

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:31 PM
To: Director of OGE; Deborah J. Bortot; David J. Apol; Heather A. Jones
Subject: RE: need some action from nominee

The nominee's personal assistant is trying to get ahold of the nominee but has not made contact yet. She is asking when the cut-off point is for us to send the documents over tonight – what should I tell her?

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:08 PM
To: Director of OGE; Deborah J. Bortot; David J. Apol
Subject: RE: need some action from nominee

Sent the EA to filer and her assistant; assistant is heading back into the office to make sure this gets signed right away and to wait for the green light to submit in Integrity. I will send the signed EA as soon as I have it.

From: Director of OGE
Sent: Monday, January 16, 2017 7:01 PM
To: Rachel K. Dowell; Director of OGE; Deborah J. Bortot; David J. Apol
Subject: RE: need some action from nominee

[Looping in Dave](#)

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 6:54 PM
To: Director of OGE; Deborah J. Bortot
Subject: RE: need some action from nominee

Yes, calling her personal assistant now.

From: Director of OGE
Sent: Monday, January 16, 2017 6:52 PM
To: Rachel K. Dowell; Deborah J. Bortot; Director of OGE
Subject: need some action from nominee

No attachment found in search

Rachel, I have spoken to Robert Gangwere. He's heading into his office now.

Can you contact the nominee's representatives and have them ask her to sign the ethics agreement and email a scanned copy ASAP. We need it right away if we're going to get this to the Senate tonight. A clean copy is attached. (Also, ask them to give you an estimate on how long it will take to get the signed EA back to us.)

(But tell them not to have her sign the 278 in Integrity until we let them know we have the green light from PTT.)

Thanks

From: [Deborah J. Bortot](#)
To: [Teresa L. Williamson](#); [Gangwere, Robert L.](#); [Sandra S. Mabry](#); [Heather A. Jones](#); [Rachel K. Dowell](#)
Subject: Fw: Mrs. Linda McMahon
Date: Tuesday, January 17, 2017 6:56:05 AM

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: Ann M Donaldson (b) (6)
Sent: Monday, January 16, 2017 11:11 PM
To: Deborah J. Bortot; Heather A. Jones
Subject: Mrs. Linda McMahon

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Mrs. Linda McMahon to be Administrator of the Small Business Administration. Please transmit herpre-cleared 278 report to the appropriate Senate committee.

Ann M. Donaldson
Associate
[JONES DAY® - One Firm WorldwideSM](#)
51 Louisiana Avenue, NW
Washington, DC 20001
Office +1 (b) (6)

=====

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

=====

From: [Deborah J. Bortot](#)
To: [Rachel K. Dowell](#); [Teresa L. Williamson](#); [b](6) - Robert Gangwere's email address
Subject: RE: Ethics Agreement - McMahon
Date: Tuesday, January 17, 2017 8:32:02 AM

Thanks

From: Rachel K. Dowell
Sent: Tuesday, January 17, 2017 8:26 AM
To: Teresa L. Williamson; Deborah J. Bortot; [b](6) - Robert Gangwere's email address
Subject: Ethics Agreement - McMahon
Importance: High

Attachment released below

Signed ethics agreement attached. I have reached out to the filer/her rep to submit in Integrity.

Robert: Once she submits, please certify and send us your signed transmittal letter.

From: [Donna Letizia](#)
To: [Rachel K. Dowell](#)
Cc: [Linda McMahon](#); (b)(6) - Robert Gangwere's email address
Subject: RE: Ethics Agreement for Senate Transmittal
Date: Tuesday, January 17, 2017 8:41:33 AM

Final version submitted.

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Tuesday, January 17, 2017 8:22 AM
To: 'Donna Letizia' <(b)(6)>
Cc: Linda McMahon <(b)(6)>, (b)(6) - Robert Gangwere's email address
Subject: RE: Ethics Agreement for Senate Transmittal

Thank you!

At this point, Ms. McMahon may now submit the final version of the OGE 287e in Integrity.

From: Donna Letizia <(b)(6)>
Sent: Tuesday, January 17, 2017 8:01 AM
To: Rachel K. Dowell
Cc: Linda McMahon
Subject: RE: Ethics Agreement for Senate Transmittal
Importance: High

Attachment released below

Hi Kimberly,

As requested, attached is the signed Ethics Agreement. Please advise when to submit the final version of the OGE 278e.

Thank you,

Donna

From: Rachel K. Dowell [mailto:rkdowell@oge.gov]
Sent: Monday, January 16, 2017 7:09 PM

To: (b)(6) - Donna Letizia's email address
Subject: FW: Ethics Agreement for Senate Transmittal

Hi Donna – Please let me know once you have a sense of timing for signature.

Also, as soon as we get the go-ahead from the transition team, I will alert you to submit a final version of the OGE 278e, public financial disclosure report.

Thanks again!

From: Rachel K. Dowell
Sent: Monday, January 16, 2017 7:07 PM
To: (b)(6) - McMahon's email address
Cc: (b)(6) - Donna Letizia's email address
Subject: Ethics Agreement for Senate Transmittal

No attachment found in search

Good evening,

Please sign the attached ethics agreement and email a scanned copy back to me as soon as possible.

If you have any questions, please feel free to contact me at (b) (6).

Thank you in advance,

Rachel Dowell

--

Rachel K. Dowell

Assistant Counsel

Office of Government Ethics

General Counsel & Legal Policy Division

Ethics Law and Policy Branch

(202) 482-9267

Visit OGE's website: www.oge.gov

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Heather A. Jones](#)
To: [Sandra S. Mabry](#)
Subject: Can you please move the McMahon docs to signature?
Date: Tuesday, January 17, 2017 10:32:01 AM

Both Rachel and her backup are out

Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.

From: [Rachel K. Dowell](#)
To: [Deborah J. Bortot](#)
Cc: [Sandra S. Mabry](#); [Teresa L. Williamson](#)
Subject: RE: McMahon Certification Letter
Date: Tuesday, January 17, 2017 10:41:11 AM

Thank you

From: Deborah J. Bortot
Sent: Tuesday, January 17, 2017 10:40 AM
To: Rachel K. Dowell
Cc: Sandra S. Mabry; Teresa L. Williamson
Subject: RE: McMahon Certification Letter

Rachel,

Patrick is out, so we are having Sandy move the paperwork unless you already have someone else doing it.

Thanks,
Deb

From: Rachel K. Dowell
Sent: Tuesday, January 17, 2017 10:26 AM
To: Teresa L. Williamson
Cc: Deborah J. Bortot; Heather A. Jones
Subject: FW: McMahon Certification Letter

Attachments released below



From: Gangwere, Robert L. [<mailto:robert.gangwere@sba.gov>]
Sent: Tuesday, January 17, 2017 10:25 AM
To: Rachel K. Dowell
Cc: Sundberg, Susan L.; McIntyre-Barnes, Marilyn E.
Subject: McMahon Certification Letter

Rachel,

Attached is my certification letter and the signed ethics agreement for Linda E. McMahon. I have also signed off on the 278e report via Integrity.gov.

Please let me know if you need anything else, and thank you for your guidance and assistance with this nomination package. We really appreciate it.

Robert



U.S. SMALL BUSINESS ADMINISTRATION
KANSAS CITY, MISSOURI 64106

OFFICE OF THE DESIGNATED AGENCY ETHICS OFFICIAL

January 17, 2017

The Honorable Walter H. Schaub, Jr.
Director
Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, D.C. 20005-3917

RE: Public Financial Disclosure Report and Ethics Agreement of Linda E. McMahon

Dear Mr. Schaub:

Pursuant to 5 CFR § 2634.201(c)(1) of the Office of Government Ethics' (OGE) regulations, I herewith submit, as the Designated Agency Ethics Official for the U.S. Small Business Administration (SBA), the required Public Financial Disclosure Report, OGE 278e (Report) of Linda E. McMahon. Ms. McMahon is President-Elect Trump's choice for Administrator of SBA.

As required by 5 CFR § 2634.605(c)(2), I have personally reviewed Ms. McMahon's Report and hereby certify that there are no unresolved conflicts of interest under applicable ethics laws and regulations.

The principal regulatory provisions that were germane to my review of Ms. McMahon's Report were as follows:

- (1) The provisions of § 2635.402 of OGE's regulations that prohibit an SBA employee's personal and substantial participation, in an official capacity, in any particular matter in which, to his or her knowledge, he or she has a financial interest, if the particular matter will have a direct and predictable effect on that interest;
- (2) The provisions of § 2635.403 of OGE's regulations that prohibit an SBA employee from acquiring or holding any financial interest that he or she is prohibited from acquiring or holding by statute, by agency regulation or by reason of an agency determination of substantial conflict of interest;
- (3) The provisions of § 2635.502 of OGE's regulations that require that an SBA employee consider the appearance of partiality in the discharge of his or her official responsibilities; and
- (4) The provisions of § 2635.804 of OGE's regulations that require that a presidential appointee to a full-time non-career position shall not receive any outside-earned income for outside employment, or for any other outside activity, performed during that presidential appointment.

Hon. Walter M. Schaub, Jr.
January 17, 2017
Page two

Ms. McMahon's executed Report may be found on Integrity.gov, and her signed Ethics Agreement (in the form of a letter addressed to me) is enclosed.

Please let me know if you have any questions. My direct number is (b) (6)

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Gangwere", with a long horizontal flourish extending to the right.

Robert L. Gangwere
Designated Agency Ethics Official

cc: Ms. Linda E. McMahon
Ms. Rachel Dowell, OGE

From: [Integrity.gov](https://integrity.gov)
To: [Sandra S. Mabry](#)
Subject: Integrity.gov: Report Pending Action
Date: Tuesday, January 17, 2017 10:56:46 AM

A 2017 Nominee report for McMahon, Linda E is pending your action as OGE Nominee Program Manager. You may access the report by logging into integrity at <https://integrity.gov>.

From: [Sandra S. Mabry](#)
To: [Teresa L. Williamson](#)
Subject: RE: reports on website
Date: Tuesday, January 17, 2017 3:27:39 PM

Booo ... rain doesn't help, either

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:48 PM
To: Sandra S. Mabry
Subject: RE: reports on website

No. still waiting. I'll probably get stuck in all the traffic at this point – yeah!

From: Sandra S. Mabry
Sent: Tuesday, January 17, 2017 2:47 PM
To: Teresa L. Williamson
Subject: RE: reports on website

Thanks.

 (b) (6)

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:46 PM
To: Sandra S. Mabry
Subject: RE: reports on website

Yes – checked this morning and nothing – still nothing.

From: Sandra S. Mabry
Sent: Tuesday, January 17, 2017 2:45 PM
To: Teresa L. Williamson
Subject: RE: reports on website

Thanks, Teresa. Did you check Senate website for nominations? President Obama announced his intent to nominate Jason Kearns (US International Trade Commission—on WHO website.

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 2:43 PM
To: Vincent Salamone
Cc: Deborah J. Bortot; Heather A. Jones; Sandra S. Mabry
Subject: reports on website

FYI. Mulvaney, Ross, McMahon have been added to the website.

From: [Shelley K. Finlayson](#)
To: [Teresa L. Williamson](#); [Sandra S. Mabry](#); [Heather A. Jones](#)
Subject: RE: call from committee
Date: Wednesday, January 18, 2017 4:16:51 PM

Liz is calling her back

From: Teresa L. Williamson
Sent: Wednesday, January 18, 2017 2:51 PM
To: Sandra S. Mabry; Shelley K. Finlayson; Heather A. Jones
Subject: RE: call from committee

She left me the message at 2:26pm if that helps.

From: Sandra S. Mabry
Sent: Wednesday, January 18, 2017 2:48 PM
To: Shelley K. Finlayson; Heather A. Jones; Teresa L. Williamson
Subject: RE: call from committee

I don't know. She called Heather directly about release of the report. Heather "showed" her where it is on our website.

From: Shelley K. Finlayson
Sent: Wednesday, January 18, 2017 2:45 PM
To: Heather A. Jones; Teresa L. Williamson; Sandra S. Mabry
Subject: RE: call from committee

Is this the same request Rachel received? If so, it was assigned to Liz Horton earlier today.

From: Heather A. Jones
Sent: Wednesday, January 18, 2017 2:32 PM
To: Teresa L. Williamson; Sandra S. Mabry; Shelley K. Finlayson
Subject: RE: call from committee

Please see below.

From: Teresa L. Williamson
Sent: Wednesday, January 18, 2017 2:31 PM
To: Sandra S. Mabry
Cc: Heather A. Jones
Subject: call from committee

Sandy, Would you please call Kaylyn from Senator Risch's office (Committee on Small Business & Entrepreneurship) Her number is (b) (6) She left me a voice mail message saying she has a question on Ms. McMahon's financial disclosure form.

Thanks
Teresa

From: [Teresa L. Williamson](#)
To: [Rachel K. Dowell](#); (b)(6) - Robert Gangwere's email address
Subject: Public Financial Disclosure Report of Linda E. McMahon
Date: Tuesday, January 31, 2017 11:13:17 AM
Attachments: [McMahon, Linda E. final278.pdf](#)
[McMahon, Linda E. finalsenateltr.pdf](#)
[McMahon, Linda E. finalEA.pdf](#)

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Morning,

I wanted to make sure that you received a copy of the nomination package that was sent to the Senate committee January 17, if you didn't already receive a copy.

Thank you.
Teresa

From: Teresa L. Williamson
Sent: Tuesday, January 17, 2017 12:03 PM
To: (b)(6) - Kathryn Eden's email address
Subject: Public Financial Disclosure Report of Linda E. McMahon

Final EA and final senate letter released below. 278 financial disclosure report withheld in full - (b)(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

Good Afternoon,

I've attached the financial disclosure package for Linda E. McMahon. President-Elect Trump has announced his intention to nominate Ms. McMahon for the position of Administrator, Small Business Administration.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



January 17, 2017

The Honorable James E. Risch
Chairman
Committee on Small Business
and Entrepreneurship
United States Senate
Washington, DC 20510

Dear Mr. Chairman:


In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Linda E. McMahon. President-Elect Trump has announced his intention to nominate Ms. McMahon for the position of Administrator, Small Business Administration.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,
**WALTER
SHAUB**

Walter M. Shaub, Jr.
Director

 Digitally signed by WALTER SHAUB
DN c=US, o=U.S. Government, ou=Office of
Government Ethics, cn=WALTER SHAUB,
0.9.2342.19200300.100.1.1=95491000364655
Date 2017.01.17 11 43 29 -05 00'

Enclosures



January 16, 2017

Robert L. Gangwere, Esq.
Designated Agency Ethics Official
U.S. Small Business Administration
1000 Walnut Street, Suite 530
Kansas City, MO 64106

Dear Mr. Gangwere:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Administrator of the U.S. Small Business Administration (SBA).

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Within 90 days of my confirmation, I will divest my interests in the following entities: HPD Alkeon Growth Partners Fund, LP; and Skybridge Multi-Advisor Fund Portfolios, LLC – Series G. With regard to each of these entities, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested them, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Within 180 days of my confirmation, I will divest my interests in HPD Millennium Strategic Capital Fund, LP. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of the entity until I have divested it, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

Upon confirmation, I will resign from my positions with the following entities: Vincent & Linda McMahon Family Foundation; APCO Worldwide of Washington, D.C.; Sacred Heart University of Fairfield, CT; Close Up Foundation of Washington, D.C.; American Corporate Partners, Inc. of New York City, NY; and Family Trust 6. For a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that these entities are a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions as managing member of the following entities: McMahon Ventures, LLC; and Women's Leadership LIVE, LLC. I will become a non-managing member of each entity. During my appointment, I will not manage these entities or provide any other services to them. Instead, I will receive only passive investment income from them. As Administrator, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I will retain my positions with the following revocable trusts: Family Trust 8; Family Trust 9A; and Family Trust 9B. I will not receive any fees for the services that I provide as an Investment Direction and Distribution Advisor during my appointment to the position of Administrator. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of these entities, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

My spouse is employed by and has an equity interest in World Wrestling Entertainment, Inc. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of World Wrestling Entertainment, Inc., unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda E. McMahon", with a stylized flourish at the end.

Linda E. McMahon

McMahon Nominee Report
Technical Review and Questions
January 2017

(b) (5)



(b) (5)



(b) (5)



(b) (5)





U.S. SMALL BUSINESS ADMINISTRATION
KANSAS CITY, MISSOURI 64106

OFFICE OF THE DESIGNATED AGENCY ETHICS OFFICIAL

January 17, 2017

The Honorable Walter H. Schaub, Jr.
Director
Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, D.C. 20005-3917

RE: Public Financial Disclosure Report and Ethics Agreement of Linda E. McMahon

Dear Mr. Schaub:

Pursuant to 5 CFR § 2634.201(c)(1) of the Office of Government Ethics' (OGE) regulations, I herewith submit, as the Designated Agency Ethics Official for the U.S. Small Business Administration (SBA), the required Public Financial Disclosure Report, OGE 278e (Report) of Linda E. McMahon. Ms. McMahon is President-Elect Trump's choice for Administrator of SBA.

As required by 5 CFR § 2634.605(c)(2), I have personally reviewed Ms. McMahon's Report and hereby certify that there are no unresolved conflicts of interest under applicable ethics laws and regulations.

The principal regulatory provisions that were germane to my review of Ms. McMahon's Report were as follows:

- (1) The provisions of § 2635.402 of OGE's regulations that prohibit an SBA employee's personal and substantial participation, in an official capacity, in any particular matter in which, to his or her knowledge, he or she has a financial interest, if the particular matter will have a direct and predictable effect on that interest;
- (2) The provisions of § 2635.403 of OGE's regulations that prohibit an SBA employee from acquiring or holding any financial interest that he or she is prohibited from acquiring or holding by statute, by agency regulation or by reason of an agency determination of substantial conflict of interest;
- (3) The provisions of § 2635.502 of OGE's regulations that require that an SBA employee consider the appearance of partiality in the discharge of his or her official responsibilities; and
- (4) The provisions of § 2635.804 of OGE's regulations that require that a presidential appointee to a full-time non-career position shall not receive any outside-earned income for outside employment, or for any other outside activity, performed during that presidential appointment.

Hon. Walter M. Schaub, Jr.
January 17, 2017
Page two

Ms. McMahon's executed Report may be found on Integrity.gov, and her signed Ethics Agreement (in the form of a letter addressed to me) is enclosed.

Please let me know if you have any questions. My direct number is (b) (6)

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. Gangwere", with a long horizontal flourish extending to the right.

Robert L. Gangwere
Designated Agency Ethics Official

cc: Ms. Linda E. McMahon
Ms. Rachel Dowell, OGE



United States Department of the Interior
OFFICE OF THE SOLICITOR
WASHINGTON, D.C. 20240

IN REPLY REFER TO:
SOL-2018-00202

July 26, 2019

Via Email: Foia@americanoversight.org

Austin Evers
American Oversight
1030 15th St NW Suite B255
Washington, DC 20005

Dear Mr. Evers,

On June 13, 2018, the Office of the Solicitor (SOL) received your Freedom of Information Act (FOIA) request from the Office of Government Ethics (OGE). In your March 9, 2017 request, you specifically ask for:

1. Records containing or reflecting communications between OGE and individuals nominated, or anticipated to be nominated, by President Trump for Senate-confirmed positions in the federal government, including communications with attorneys or agents acting on behalf of such nominees or prospective nominees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such nominees or prospective nominees.
2. Records containing or reflecting communications between OGE and individuals appointed, or anticipated to be appointed, by President Trump for positions in the Executive Office of the President in the White House, including communications with attorneys or agents acting on behalf of such appointees or prospective appointees, as well as members of the Trump administration, the Trump transition team, or the Trump campaign about such appointees or prospective appointees.

The Office of Government Ethics found 147 of documents in SOL. The OGE applied redactions to exempt materials within the pages before referring the records to Sol for review. Upon review, the Office of the Solicitor has included additional redactions and we are releasing 118 pages are being released to you in full, 28 pages are being redacted in part, and 1 blank page is being withheld. We are redacting pages pursuant to Exemption 5 deliberative and Exemption 6 which allows an agency to withhold "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." 5 U.S.C. § 552(b)(6).

Deliberative Process Privilege

The deliberative process privilege protects the decision-making process of government agencies and encourages the frank exchange of ideas on legal or policy matters by ensuring agencies are not forced to operate in a fish bowl. A number of policy purposes have been attributed to the deliberative process privilege. Among the most important are to: (1) assure that subordinates will feel free to provide the decision-maker with their uninhibited opinions and recommendations; (2) protect against premature disclosure of proposed policies; and (3) protect against confusing the issues and misleading the public.

The deliberative process privilege protects materials that are both predecisional and deliberative. The privilege covers records that reflect the give-and-take of the consultative process and may include recommendations, draft documents, proposals, suggestions, and other subjective documents which reflect the personal opinions of the writer rather than the policy of the agency.

The materials that have been withheld under the deliberative process privilege of Exemption 5 are both predecisional and deliberative. They do not contain or represent formal or informal agency policies or decisions. They are the result of frank and open discussions among employees of the Department of the Interior. Their contents have been held confidential by all parties and public dissemination of this information would expose the agency's decision-making process in such a way as to discourage candid discussion within the agency, and thereby undermine its ability to perform its mandated functions.

The deliberative process privilege does not apply to records created 25 years or more before the date on which the records were requested.

Personnel and Medical Files

The phrase "similar files" covers any agency records containing information about a particular individual that can be identified as applying to that individual. To determine whether releasing records containing information about a particular individual would constitute a clearly unwarranted invasion of personal privacy, we are required to balance the privacy interest that would be affected by disclosure against any public interest in the information.

Under the FOIA, the only relevant public interest to consider under the exemption is the extent to which the information sought would shed light on an agency's performance of its statutory duties or otherwise let citizens 'know what their government is up to. The burden is on the requester to establish that disclosure would serve the public interest. When the privacy interest at stake and the public interest in disclosure have been determined, the two competing interests must be weighed against one another to determine which is the greater result of disclosure: the harm to personal privacy or the benefit to the public. The purposes for which the request for information is made do not impact this balancing test, as a release of information requested under the FOIA constitutes a release to the general public.

The information that has been withheld under Exemption 6 consists of personal information, email addresses, and Compensation amounts and we have determined that the individuals to whom this

information pertain have a substantial privacy interest in withholding it.

Jennifer Heindl, Attorney-Advisor, Office of the Solicitor was consulted in reaching this decision. Lance Purvis, FOIA Officer, Office of the Solicitor, is responsible for making this decision. You may contact the FOIA Officer at sol.foia@sol.doi.gov for further assistance and to discuss any aspect of your request.

This concludes the Office of the Solicitor's response to your request. The fee incurred in responding to your request is less than \$50 and is not being charged in accordance with 43 CFR 2.16(b)(2).

If you consider this response to be a denial of your request, you may appeal this response to the Department's FOIA Appeals Officer. If you choose to appeal, the FOIA Appeals Officer must receive your FOIA appeal no later than 90 workdays from the date of this letter. Appeals arriving or delivered after 5 p.m. Eastern Time, Monday through Friday, will be deemed received on the next workday. Your appeal must be in writing and addressed to:

FOIA Appeals Officer
U.S. Department of the Interior
1849 C Street, N.W., MS 6556
Washington, D.C. 20240
Phone: 202-208-5339
Fax: 202-208-6677
Email: FOIA.Appeals@sol.doi.gov

You must include with your appeal copies of all correspondence between you and the Office of the Solicitor concerning your FOIA request, including a copy of your original FOIA request and your denial letter. Failure to include this documentation with your appeal will result in the Department's rejection of your appeal. All communications concerning your appeal, including envelopes, should be clearly marked with the words "FREEDOM OF INFORMATION APPEAL." You must include an explanation of why you believe the Office of the Solicitor's response is in error. For more information on FOIA Administrative Appeals, you may review the Department's FOIA regulations at 43 C.F.R. Part 2, Subpart H.

Sincerely,



Lance Purvis
Office of the Solicitor FOIA Officer

From: LNAPPS1.USOGE@oge.gov
To: [Lorna A. Syme](#)
Subject: IMPORTANT - ACTION NEEDED - New Nominee Assigned - Begin Review & Send 1st Set of Comments - Ryan Zinke
Date: Wednesday, December 21, 2016 10:00:10 AM

Nominee, Ryan Zinke, has been assigned to you.

ACTION: Within 2 days, please begin your review of the report and send the first set of comments/questions to the agency (by email or phone). If you need additional time, please contact Teresa or Deb.

Please log completion of this step into FDTS by entering a date and then clicking the forward routing button to save and mark this step complete.

Remember to add a new Progress Report for this nominee and update the progress at the end of each week until the report and EA have been precleared.

The link below will take you to the FDTS record.

Nonresponsive network info

From: [Integrity.gov](https://integrity.gov)
To: [Lorna A. Syme](#)
Subject: Integrity.gov: Report Pending Action
Date: Wednesday, December 21, 2016 10:01:54 AM

A 2017 Nominee report for Zinke, Ryan is pending your action as OGE Nominee Reviewer. You may access the report by logging into integrity at <https://integrity.gov>.

From: [McDonnell, Edward](#)
To: [Teresa L. Williamson](#)
Cc: [Melinda J Loftin](#); [Lorna A. Syme](#)
Subject: Re: Draft Nominee Report in Integrity
Date: Wednesday, December 21, 2016 1:05:00 PM

Thanks very much, Teresa and I look forward to working with you, Lorna!!!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Wed, Dec 21, 2016 at 12:10 PM, Teresa L. Williamson <tlwillia@oge.gov> wrote:

| Hi Ed,

Lorna Syme is the OGE Reviewer for Mr. Zinke. She can be reached at (202) 482-9277 or by email (she's cc'd on this email).

Thanks! Teresa

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Wednesday, December 21, 2016 11:41 AM
To: Teresa L. Williamson
Cc: Melinda J Loftin
Subject: Draft Nominee Report in Integrity

Hi Teresa,

We have received a draft report in Integrity. Will OGE be letting us know who the OGE reviewer will be?

Thanks!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Lorna A. Syme](#)
To: ["Edward McDonnell"](#)
Subject: nominee report
Date: Wednesday, December 21, 2016 2:44:20 PM
Attachments: [Initial Questions Zinke.docx](#)

3 page attachment withheld in full - (b)(3),
(4), (5), (6)

Ed:

Attached are my initial comments. Let me know if I can do anything to help!

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: [>>www.oge.gov<<](http://www.oge.gov)
Follow OGE on Twitter: @OfficeGovEthics

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: nominee report
Date: Wednesday, December 21, 2016 3:22:54 PM

Thanks very much, Lorna!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Wed, Dec 21, 2016 at 2:44 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

3 page attachment withheld in full - (b)(3), (4), (5), (6)

Attached are my initial comments. Let me know if I can do anything to help!

Lorna

Lorna Syme

Presidential Nominations Branch

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917

Telephone: (202) 482-9277

Facsimile: (202) 482-9237

Visit OGE's website: >>www.oge.gov<<

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: contact information
Date: Thursday, December 22, 2016 11:57:30 AM

Will do, Lorna!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Thu, Dec 22, 2016 at 11:45 AM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

Would you please confirm with the filer that he or a representative will be available to work on the report next week. We need to keep this report moving.

Thanks!

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Thursday, December 22, 2016 11:28 AM
To: Lorna A. Syme
Subject: Re: contact information

Thanks, Lorna!!!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Thu, Dec 22, 2016 at 11:23 AM, Lorna A. Syme <lasyme@oge.gov> wrote:

(b) (6)

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: >>www.oge.gov<<

Follow OGE on Twitter: @OfficeGovEthics

From: [Emory A. Rounds III](#)
To: ["James Carroll"](#)
Subject: RE: Emory needs Zinke's contact info
Date: Thursday, December 22, 2016 11:59:27 AM

No "rep" then?

From: James Carroll (b) (6)
Sent: Thursday, December 22, 2016 11:58 AM
To: Emory A. Rounds III
Subject: Fwd: Emory needs Zinke's contact info

----- Forwarded message -----

From: **Emily Mallon** (b) (6) >
Date: Thu, Dec 22, 2016 at 11:55 AM
Subject: Re: Emory needs Zinke's contact info
To: James Carroll (b) (6)

(b) (6)

On Thu, Dec 22, 2016 at 11:54 AM, James Carroll (b) (6) > wrote:
May I please have Zinke's personal cell phone number?

----- Forwarded message -----

From: **Rene Augustine** (b) (6) >
Date: Thu, Dec 22, 2016 at 11:45 AM
Subject: Emory needs Zinke's contact info
To: James Carroll (b) (6) >

--

Emily Mallon
Presidential Transition Team

(b) (6)

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Re: Nominee OGE Form 278e
Date: Friday, December 23, 2016 1:16:01 PM

Certainly, Lorna! I'll try to keep up with you!!!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Fri, Dec 23, 2016 at 1:10 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Can I go ahead and make some of the edits to the report (adding some of the (b)(3), (6) etc.)? You will be able to review all of my changes – but it might be faster if we are making the changes as they come in.

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Friday, December 23, 2016 1:02 PM
To: Lorna A. Syme
Cc: Melinda J Loftin
Subject: Fwd: Nominee OGE Form 278e

Hi Lorna,

Just received responses from Mr. Zinke. I'm about to head out of the office but will be reviewing at home this weekend. Do you want/not want to be disturbed over the holiday?

Thanks,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: **Ryan Zinke** <(b) (6)>
Date: Fri, Dec 23, 2016 at 12:34 PM
Subject: Re: Nominee OGE Form 278e
To: "McDonnell, Edward" <(b) (6)>

No attachment found in search

Edward, attached are the answers to the questions as requested. I have not entered the information into the online OGE form as I am waiting for review and comment of the questions. I will be in DC on the 30th of December through confirmation. Pls let me know if there is anything else u need. I am available via cel (b) (6) anytime. Better to text and I will call back. Merry Christmas. z

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
To: ryanzinke@yahoo.com
Sent: Thursday, December 22, 2016 1:49 PM
Subject: Nominee OGE Form 278e

Dear Mr. Zinke,

I am the Deputy Designated Agency Ethics Official at the Department of the Interior and I will be helping you complete your nomination OGE Form 278e. I will be

working with a reviewer at the Office of Government Ethics (OGE) but I should be the only one contacting you regarding the review of your report.

As part of the review process, we will be asking you questions to help ensure that the report is complete and technically correct. We will also be addressing potential conflicts of interest, if any, and possible remedies for those conflicts. I ask your indulgence as this is often an iterative process as we refine your report and the potential remedies.

Please know that our Designated Agency Ethics Official, Melinda Loftin, is currently on leave and should return on January 3rd. I will keep her informed of our progress.

Turning to the report itself, our OGE reviewer and I have done an initial review and we have a number of questions and comments that I will list below. I have also attached a Word document with these questions and comments in case you find that easier to use to provide your responses and comments. Please let me know if you need additional information or explanation to answer any of our questions.

One thing before I get into the questions and comments on the report -- I wanted to check to see if you will be available next week to work on the report so that we can keep the process moving forward as quickly as possible.

Questions/Comments:

1. Do you plan to keep your campaign committee open?
 - a. Does the campaign owe you any money?
2. Do you have any dependent children?

a. If so, have all reportable assets for the dependent children been disclosed (including any 529 plans)?

3. Have you listed all reportable stocks, bonds, trusts, annuities, life insurance (not term life), rental real estate, etc.?

4. Are you a trustee of any trusts, or the beneficiary of any trusts?

5. Is your spouse the beneficiary of any trusts?

Part 1

1. Please confirm your position with Great Northern Veterans Peace Park Foundation is uncompensated.

Part 2

1. Please delete the TSP as it need not be reported.

2. Please confirm that you have no non-Federal retirement plans such as defined benefit or defined contribution plans, IRAs, state or local retirement

plans, etc.

3. Please confirm that you do not have any equity (stock, stock options, restricted stock, etc.) in STWA (or QS Energy)?

4. Please confirm that you do not have any equity (stock, stock options, restricted stock, etc.) in On Point Montana.

Part 4:

1. On Point Montana: You were the President through 12/14. Please confirm that you were not paid more than \$5,000 for your services during 2014.

2. Please confirm that you have listed all organizations and clients that paid you more than \$5,000 for your personal services during 2014, 2015, or 2016.

Part 5

1. Your wife receives salary from _____ in the amount _____

a. Is this a family trust?

(1) If so, the underlying holdings may be reportable (we will need to discuss whether you, your wife, or dependent children have a vested beneficial interest).

b. Does the _____ represent a salary or a trustee fee?

c. If this is not a trust, please provide additional information on the nature of the business.

2. Does your wife have any retirement benefits (e.g. IRAs, defined benefit plans, defined contribution plans)?

Part 6

1. Continental Divide International. Value of the business is listed as \$500,001-1 million and rent or royalties of \$1,001-2,500.

a. What is the nature of the business?

b. What, if any, are the underlying assets?

c. If this is composed of rental real estate, then please describe the type of real estate and the city, state (e.g. residential real estate in Washington, DC).

2. Art Collection -- please change to indicate "N/A" for the EIF column.

3. Auto Collection -- please change to indicate "N/A" for the EIF column.

4. Double Tap LLC. Value of the business is listed as \$100,001-250,000 and rent or royalties of \$1,001-2,500.

a. What is the nature of the business?

b. What, if any, are the underlying assets?

c. If this is composed of rental real estate, then please describe the type of real estate and the city, state (e.g. residential real estate in Washington, DC).

5. Cash Accounts (Lines 5, 10, and 11) - please modify these using the revised disclosure reporting guidance: e.g. U.S. bank account #1 (cash). This guidance can be found at <https://www.oge.gov/Web/278eGuide.nsf/2f96d42716636dbf85257f490052263c/2cc9c76f5a8ac51985257f45006687c1?OpenDocument>.

6. Boat and Boat Slip - are these for personal use solely or are they held for investment/business?

a. If solely personal, they may be removed from the report.

7. USAA - what are these? Are they cash accounts (see above) or are there underlying assets that will need to be disclosed as separate line items?

8. Charles Schwab

a. Is this stock or is this an account with underlying assets that will need to be disclosed as separate line items?

b. If this is stock, the EIF column should be "N/A".

9. You appear to have at least one book that should be reported "American Commander: Serving a Country worth Fighting For and Training the Brave Soldiers Who Lead the Way." The book appears to be recently published.

a. Are there any future services that you will be providing regarding the book (e.g. promotional appearances, updates etc.)?

10. Are you engaged in any outside writing currently?

11. Do you receive any other royalties on outside writing or speaking, or do you have any continuing arrangement to receive royalties in the future?

12. Have you listed all investment real estate?

Part 8

1. Do you have a loan on the boat or the boat slip? If so, they are reportable.

2. Have you listed all mortgages on investment real estate?

Thank you very much for your time and attention on this matter and, again, if you have any questions or would care to discuss, please let me know.

Best regards,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

T

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Edward McDonnell](#)
To: [Lorna A. Syme](#)
Subject: Re: Nominee
Date: Friday, December 23, 2016 11:35:33 PM

Will do! Thanks, Lorna. Please know that I have to drive to Petersburg, VA, tomorrow morning to pick up of my daughters. It's straight down 95 so traffic may be tough.

Sent from my iPhone

On Dec 23, 2016, at 11:16 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Hi Ed:

3 page attachment withheld in full - (b)(3), (4), (5), (6)

I went ahead and made some changes to the 278e in Integrity. Please see attached for my notes on the changes I made and questions that I have based on his responses (my comments are in red).

Please feel free to call if you want to discuss any of my comments. I will also be checking my emails periodically throughout the day.

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: www.oge.gov
Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please

From: [Lorna A. Syme](#)
To: ["McDonnell, Edward"](#)
Subject: Nominee report
Date: Tuesday, December 27, 2016 6:53:15 PM
Attachments: [Draft ethics agreement Zinke.docx](#)

2 page attachment withheld in full - (b) (3), (4), (5), (6)

Ed:

Attached is a draft ethics agreement for your review (I wouldn't share it with the filer yet).

In drafting the ethics agreement and preparing my notes, I have a few additional follow-up questions for the filer.

(b)(3), (5), (6)



Thanks very much!
Lorna

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Fwd: Nominee OGE Form 278e
Date: Wednesday, December 28, 2016 8:01:52 AM
Attachments: [Zinke Ryan - OGE Form 278e 27 DEC.docx](#)

Hi Lorna!

Here is Mr. Zinke's response to the last set of questions.

Thanks for the draft ethics agreement and questions. Will review and move forward.

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you

received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: **Ryan Zinke** (b) (6) >
Date: Tue, Dec 27, 2016 at 4:20 PM
Subject: Re: Nominee OGE Form 278e
To: "McDonnell, Edward" (b) (6)

No attachment found in search

Ed, attached are the responses. (b)(3), (4), (6)

Please let me know if there is anything else you need. I will be in DC on the 30th of December through confirmation and inauguration. z

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
To: Ryan Zinke <ryanzinke@yahoo.com>
Cc: Melinda J Loftin <Melinda.Loftin@sol.doi.gov>
Sent: Tuesday, December 27, 2016 7:19 AM
Subject: Re: Nominee OGE Form 278e

Hi Mr. Zinke,

I hope you had a great Christmas!

Based on your previous response, the reviewer at OGE has made some changes to your report in Integrity and has provided additional comments and questions (please see attached).

Thanks very much,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell
Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior
Departmental Ethics Office
Office of the Solicitor
E-mail: edward.mcdonnell@sol.doi.gov
Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)
Located at:
Main Interior Building

Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427
Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

Rest of chain partially released above



From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: nominee
Date: Wednesday, December 28, 2016 4:10:29 PM
Attachments: [Follow-up Questions 12-28-2016.docx](#)

Thanks, Lorna! I sent the attachment to Mr. Zinke.

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Wed, Dec 28, 2016 at 4:02 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

| It can be either N/A or No. Either works in this case – just not “yes”. Your preference.

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Wednesday, December 28, 2016 3:46 PM
To: Lorna A. Syme
Subject: Re: nominee

Quick question, Lorna - in Part 6, should the EIF column indicate N/A for Continental Divide, LLC and Double Tap, LLC?

Thanks,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW

Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Wed, Dec 28, 2016 at 10:08 AM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

9 page attachment withheld in full - (b)(3), (4), (5), (6)

Based on his latest responses, I have a couple of questions regarding the (b)(3), (6)

(b)(3), (4), (5), (6)

I'm also attaching the latest draft so you and the filer can see the latest changes. The filer should let us know if there is anything that needs to be changed on the report.

Lorna

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Out of Office RE: Nominee
Date: Thursday, December 29, 2016 6:36:36 PM

I will be out of the office on Friday, December 30, 2016 through Monday, January 2, 2017. If you need immediate assistance, please call (202) 208-7960 or email DOI_Ethics@sol.doi.gov.

Thank you,
Ed

--

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

From: [Melinda Loftin](#)
To: [Edward McDonnell](#)
Cc: [Lorna A. Syme](#)
Subject: Re: Nominee OGE Form 278e
Date: Saturday, December 31, 2016 12:32:57 PM

You two are the best. Thanks for all of your hard work and HAPPY NEW YEAR!!!!

Sent from my iPhone

On Dec 31, 2016, at 9:09 AM, Edward McDonnell <edward.mcdonnell@sol.doi.gov> wrote:

Thanks, Lorna!

I have appointments at 10 and 11 today. After those, I'll draft something up to send him. If I have questions or am unsure of something, I'll run it by you first.

Ed

Sent from my iPhone

On Dec 30, 2016, at 6:52 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:
(b)(3), (4), (5), (6)



Thank you so much. I think we are really close. Please let me know when you are ready to discuss the ethics agreement.

Lorna

From: Edward McDonnell [<mailto:edward.mcdonnell@sol.doi.gov>]
Sent: Friday, December 30, 2016 12:09 PM
To: Lorna A. Syme
Cc: Melinda J Loftin
Subject: Fwd: Nominee OGE Form 278e
Hi Lorna. Latest response from Mr. Zinke!

Sent from my iPhone

Begin forwarded message:

From: ryanzinke <ryan@zinke.com>
Date: December 29, 2016 at 10:36:29 PM EST
To: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
Subject: Re: Nominee OGE Form 278e

Ed, I am traveling and am doing this on my phone.

Trust.

1. The _____ has no other assets other than rental property and an undeveloped lot.
2. Neither Lolita Zinke or myself received any income from the _____ during this reporting period. exception is an _____ management fee that the trust distributed to lolita.

Book.

1. only income from book is future royalties
2. no contract or obligation exists for future events etc.

Double Tap.

1. My wife and I are officers in the LCC. other partners are my _____,

2. Only double tap asset is a residential rental property value at 200k which reports a net loss and has no other income during the report period.

On point Montana.

1. On point Montana was a consulting business
2. I received no income in 2014 and my interest was sold on December 31, 2014.

Continental Divide International (CDI)

1. CDI had one client in 2014 over 5000.00. STWA. save the world air. ticket symbol zero. contract was valued at 60k.

2. I did not receive any income from CDI in 2014 as CDI had a net loss in 2014.

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>

Date: 28/12/2016 13:08 (GMT-08:00)

To: Ryan Zinke

Cc: Melinda J Loftin <Melinda.Loftin@sol.doi.gov>

Subject: Re: Nominee OGE Form 278e

Mr. Zinke,

We're zeroing in pretty well on this report. I've attached some additional questions to further fine tune it.

I've also attached the latest draft of the report from OGE so you can see how it's shaping up.

Thanks very much for your patience and for your quick turnaround!

Ed

* --- Please note that **a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, **reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. --- *

**

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official

U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building

Room 7348

Office: (202) 208-5916

Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov
<DOI_Ethics@sol.doi.gov> or visit us online at www.doi.gov/ethics
<<http://www.doi.gov/ethics>>*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

Rest of chain partially released above



From: [Lorna A. Syme](#)
To: ["McDonnell, Edward"](#)
Cc: ["Melinda J Loftin"](#)
Subject: RE: Nominee OGE Form 278e
Date: Sunday, January 01, 2017 10:39:09 AM

Happy New Year!

Questions look good to me.

(b)(3), (5), (6)

I'm hoping we can send this up for preclearance early in the week.

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]

Sent: Saturday, December 31, 2016 7:38 PM

To: Lorna A. Syme

Cc: Melinda J Loftin

Subject: Re: Nominee OGE Form 278e

Hi Lorna,

Sorry for the delay. Everything always takes longer and costs more to do than we plan!

I propose to send the following to Mr. Zinke. Have I gotten it right? Did I ask all the necessary questions?

Double Tap, LLC

The distinction we are trying to make with respect to Double Tap, LLC, is whether you are a managing, as opposed to a non-managing, member of the LLC. Generally, managing members are authorized to make decisions and take management actions affecting and on behalf of the LLC, while a non-managing member is not authorized to so act and receives only passive investment income from the LLC. It is common for all members of an LLC to be managing members. The ethics rules and White House policy, however, do not permit Presidentially appointed, Senate-confirmed (PAS) officials to hold such management positions and also require that such positions be reported on the individual's OGE Form 278e. Once confirmed, a PAS appointee would have to resign from his or her position as a managing member and become a non-managing member instead. The appointee would be permitted, however, to receive passive investment income from the LLC, during his or her appointment. Accordingly, could you please clarify whether you are a managing, as opposed to a non-managing, member of Double Tap, LLC?

In one of your emails, you indicated that "the gross income from rentals before distribution is approximately 250K." The amount that we need to report on your 278e is your wife's share of the trust income earned for the period October 2016 to December 18, 2016 only. If you can give us that amount, we will list that category on your report.

Continental Divide International (CDI)

You confirmed that you did not receive any income from CDI in 2014. Please confirm that you received no compensation from CDI during 2015-2016 (you have listed the rent for the rental properties on Part 6).

Thanks,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

Rest of chain partially released above



From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Fwd: Nominee OGE Form 278e
Date: Sunday, January 01, 2017 9:16:01 PM

Hi Lorna,

Additional info from Mr. Zinke.

I think |

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: ryanzinke (b) (6) >
Date: Sun, Jan 1, 2017 at 7:10 PM
Subject: Re: Nominee OGE Form 278e
To: "McDonnell, Edward" (b) (6)

(b)(3), (4), (6)

Z

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
Date: 01/01/2017 13:21 (GMT-05:00)
To: ryanzinke (b) (6) >
Cc: Melinda J Lortin <Melinda.Lortin@sol.doi.gov>
Subject: Re: Nominee OGE Form 278e

Happy New Year, Mr. Zinke!

We and OGE have reviewed your latest responses and we have these refining questions:

Double Tap, LLC

The distinction we are trying to make with respect to Double Tap, LLC, is whether you are a managing, as opposed to a non-managing, member of the LLC. Generally, managing members are authorized to make decisions and take management actions affecting and on behalf of the LLC, while a non-managing member is not authorized to so act and receives only passive investment income from the LLC. To my understanding, it is common for all members of an LLC to be managing members. The ethics rules and White House policy, however, do not permit Presidentially appointed, Senate-confirmed (PAS) officials to hold such management positions and also require that such positions be reported on the individual's OGE Form 278e. Once confirmed, a PAS appointee would have to resign from his or her position as a managing member and become a non-managing member instead. The appointee is permitted, however, to receive passive investment income from the LLC, while in the non-managing position. Accordingly, could you please clarify whether you are currently a managing, as opposed to a non-managing, member of Double Tap, LLC?

Hand Trust

In one of your emails, you indicated that "the gross income from rentals before distribution is approximately 250K." The specific amount that we need to report on your 278e is your wife's share of the trust income earned for the period October 2016 to December 18, 2016 only. We have to report this amount even if, as in this case, she has not yet received it. For example, if the trust earned \$2500 during that specific period and your wife's share of that income would

ultimately be 50% of that, i.e., \$1250, we would report the category "\$1,001 to \$15,000." If you can give us the correct amount, we will list that category on your report.

Continental Divide International (CDI)

You confirmed that you did not receive any income from CDI in 2014. Please confirm that you received no compensation from CDI during 2015-2016 (you have listed the rent for the rental properties on Part 6).

Please let me know if you have any questions or would care to discuss.

Thanks very much,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior

Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

Rest of chain partially released above



From: Lorna A. Syme
To: "McDonnell, Edward"
Cc: "Melinda J Loftin"
Subject: RE: Nominee OGE Form 278e
Date: Monday, January 02, 2017 2:03:33 PM
Attachments: Draft ethics agreement Zinke.docx
1 2 17 draft 278e pdf

11 page attachment withheld in full -
(b)(3), (4), (5), (6)

Ed,

Sorry – just saw your emails from yesterday.

(b)(3), (4), (5), (6)

I would like to share this draft with my supervisor before we share with the filer. Maybe we can talk tomorrow about the conflicts analysis if you have that ready?

Thanks!

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Sunday, January 01, 2017 4:39 PM
To: Lorna A. Syme
Cc: Melinda J Loftin
Subject: Fwd: Nominee OGE Form 278e

Hi Lorna,

This forwards Mr. Zinke's response. I've also copied and pasted it below, along with my comments/questions to you. He would like to talk on the phone so I'd like to make sure I have this right before I talk with him.

Double tap. the four members (myself, my wife, [REDACTED]) are all managing partners. Upon confirmation, I will resign as managing partner. same with Continental Divide International LLC.

I don't see the need for additional info here, do you? Looks like we'll be treating CDI the same as Double Tap for EA purposes, though.

[REDACTED] the trust has an annual gross income of 250k which, after expenses, was distributed to [REDACTED] Lolita did not receive any income from the trust. Lolita only received a small management fee for Nani g the rental property. [REDACTED] and, by the terms of the trust, all income goes to the trust until final distribution of property after taxes. the trust assets will be appraised and distributed in 2017.

Let's talk about the [REDACTED] to clarify any points. what is you cell?

Approximating October through December 18, 2016, to equal three months, the trust's gross income for that period would have been approximately 62.5K. Then, assuming the income would go equally to her and [REDACTED], her portion of that gross income would have been \$31.25K. I can ask him to verify or correct the assumptions. Based on the following from the 2004 Reviewer's Guide, I'd say gross (rather than net) income must be reported, correct?

Definition of Income

Investment Income

INVESTMENT INCOME, as discussed above, includes INTEREST, rents, royalties, DIVIDENDS and CAPITAL GAINS of the filer, his spouse, and his dependent children. It includes income derived from all forms of property (such as securities, funds, accounts, and real estate); annuities; partnerships, joint ventures, and businesses; the investment portion of life insurance or endowment contracts; and income from interests in trusts (see discussion above on aggregating income). Generally, filers must report gross income exceeding \$200 from any single source (category of amount). Filers may note their net income in addition to their gross income if they desire to show a loss. For partnerships, LLC's, S-Corps and sole proprietorships (in the case of the filer) the actual amount is required. Example: Rent received on a house totals \$9,600 during the year. The filer must report the \$9,600 even if the property cost \$12,000 in expenses. The filer may note a \$2,400 net loss.

I received no income from CDI in 2016-2016. rental income was offset by expenses, property taxes, and capital improvements.

Is his analysis correct here--that since the rental income was offset by expenses, etc., his 278e reportable income would be zero? It would seem correct in light of the following from the 2004 guide:

Earned Income

Filers must report the actual amount of their EARNED INCOME acquired during the reporting period from any one source in excess of \$200. Earned income includes fees, salaries, commissions, HONORARIA, and any other compensation for personal services, but excludes Federal Government salary and other Federal benefits (including retirement, unemployment benefits and veterans' benefits).

Also, we need to get the below information to put in Part I for Double Tap, LLC, correct?

ORGANIZATION NAME -- CITY, STATE -- ORGANIZATION TYPE -- POSITION HELD -- FROM -- TO

Is there anything else you think I should know before talking to him?

Thanks very much!!!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI.Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: ryanzinke (b) (6) >

Date: Sun, Jan 1, 2017 at 2:30 PM

Subject: Re: Nominee OGE Form 278e

To: "McDonnell, Edward" <(b) (6)>

(b)(3), (4), (6)

Let's talk about the (b)(3), (6) to clarify any points. what is you cell?

Z

Sent from my Verizon Wireless 4G LTE smartphone

Rest of chain partially released above

From: [McDonnell, Edward](#)
To: [rvanzinke](#)
Cc: [Melinda J Loftin](#); [Lorna A. Syme](#)
Subject: Re: Nominee OGE Form 278e
Date: Monday, January 02, 2017 6:08:36 PM
Attachments: [1 2 17 draft 278e.pdf](#)

Hi Mr. Zinke,

Sorry for the delay. Our counterpart at OGE and I have been coordinating on this.

My work cell number is (202) 510-8427.

To help explain our approach to reporting the _____ offer the following:

When your wife's mother passed away, your wife gained a vested beneficial interest in the trust. Accordingly, her share of the trust's gross income from that point to the date you signed your report must be reported. You indicated that the trust's gross annual income from the rentals was \$250K. Approximating October through December 18, 2016 to equal three months, the trust's gross income for that period would have been approximately \$62.5K. Then, assuming the income would go equally to her and _____ her portion of that gross income would have been approximately \$31.25K. That would put her income in the category of \$15,001 to \$50,000. Our counterpart at OGE has entered that amount in the header to line 11 in Part 6 of the attached draft 278e.

- Are we correct in our assumption that the trust income would go equally to your wife and _____

- Do you agree with that amount category?

I'd also like to check something with respect to Continental Divide International. In a previous response, you indicated "Double tap. the four members (myself, my wife, _____ are all managing partners. Upon confirmation, I will resign as managing partner. same with Continental Divide International LLC." I'm not sure if that means that the same four people are members of Continental Divide International as well. Your 278e currently shows rental income of \$1,001 to \$2,500 for the rental property associated with Continental Divide International. Your reported amount is supposed to represent your share (meaning your personal share, your wife's share, and your dependent children's share (if any) of the gross rental income received by Continental Divide International during the reporting period). The reporting period for Part 6 of your report is calendar year 2015 and calendar year 2016 up to December 18, 2016 (the date you filed your report). Does \$1,001 to \$2,500 accurately reflect "your share" of the gross rental income for the reporting period or did some portion of the gross rental income go to other members of the LLC, requiring us to change the amount category?

Please feel free to call me tonight on that cell number or between 7:00 and 3:30 tomorrow at my office number--(202) 208-5916.

Thanks very much,

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

Rest of chain partially released above



From: [Lorna A. Syme](#)
To: ["McDonnell, Edward"](#)
Cc: ["Melinda J Loftin"](#)
Subject: RE: Nomination
Date: Tuesday, January 03, 2017 12:13:17 PM

Sounds great – thank you!

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Tuesday, January 03, 2017 11:59 AM
To: Lorna A. Syme
Cc: Melinda J Loftin
Subject: Nomination

Hi Lorna,

I was talking with Mr. Zinke when you called but I got your message. I've got some info to pass on.

Melinda and I are discussing current status and we have to give an exit briefing to the Director of the National Park Service at 12:15. I/we will get up with you ASAP after that.

I've attached a track changes version of the ethics agreement for your review and consideration. I'll fill you in on my thoughts when we talk later, OK?

Thanks!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building

Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Ethics Agreement
Date: Tuesday, January 03, 2017 3:14:45 PM
Attachments: [Draft ethics agreement Zinke 1-2-17 mcd2.docx](#)

Hi Lorna,

Revised draft attached, including supplemental regs language.

He will send me his Senate questionnaire and the start date for Double Tap.

I will check with him regarding whether he wants it to be _____ or Family Trust.

I will do some more research on the name of the publisher for his book.

Thanks,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: revised ethics agreement
Date: Wednesday, January 04, 2017 8:13:44 AM

Thanks very much, Lorna!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Tue, Jan 3, 2017 at 5:47 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

2 page attachment withheld in full - (b)(3), (4), (5), (6)

Please see attached ethics agreement draft with OGE's suggested changes.

(b)(3), (5), (6)

A large black rectangular redaction box covering several lines of text.

Lorna

Lorna Syme

Presidential Nominations Branch

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917

Telephone: (202) 482-9277

Facsimile: (202) 482-9237

Visit OGE's website: >>www.oge.gov<<

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Fwd: Nominee OGE Form 278e
Date: Wednesday, January 04, 2017 8:15:19 AM
Attachments: [Senate CORRECTED QUESTIONNAIRE 3JAN_Verson 1551.docx](#)

Hi Lorna,

Senate questionnaire and Double Tap started 6/6/2011!

Thanks,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: **Ryan Zinke** (b) (6)
Date: Tue, Jan 3, 2017 at 6:32 PM
Subject: Re: Nominee OGE Form 278e
To: "McDonnell, Edward" (b) (6)

No attachment found in search

Ed, attached is the version that legal has reviewed. Also, (b)(3), (6)
(b) (6) all the best, z

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
To: ryanzinke <ryanzinke@yahoo.com>
Sent: Tuesday, January 3, 2017 5:30 AM
Subject: Re: Nominee OGE Form 278e

Sounds great, Mr. Zinke!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior
Departmental Ethics Office
Office of the Solicitor
E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348

Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Tue, Jan 3, 2017 at 12:23 AM, ryanzinke (b) (6) > wrote:

Thanks ed. I will call tomorrow. I think we are almost there. z

Sent from my Verizon Wireless 4G LTE smartphone

Rest of chain partially released above

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: Fwd: Nominee OGE Form 278e
Date: Thursday, January 05, 2017 8:09:28 AM

Hi Lorna,

I take this to mean that we can change '_____ to "Family Trust."

I went back to him to clarify that we need a name from him for the publishing company and he emailed back that he will send me a copy of the contract. I'll let you know as soon as I receive it.

Thanks!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended

recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: ryanzinke (b) (6) >
Date: Wed, Jan 4, 2017 at 7:00 PM
Subject: Re: Nominee OGE Form 278e
To: "McDonnell, Edward" (b) (6)

All good. thank u!

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
Date: 04/01/2017 12:57 (GMT-05:00)
To: Ryan Zinke <ryanzinke@yahoo.com>
Subject: Re: Nominee OGE Form 278e

Mr. Zinke,

Thank you very much for the questionnaire and the additional info.

I confirmed that gross rental income should be reported for CDI and Double Tap, so we will make those changes.

Is it okay if we change " to "Family Trust" on your 278e? OGE's normal convention is to use "Family Trust" rather than the specific name of the trust for privacy reasons.

The copyright page of your book indicates that it was "[p]ublished in Nashville, Tennessee, by W Publishing Group, an imprint of Thomas Nelson. W Publishing and Thomas Nelson are registered trademarks of HarperCollins Christian Publishing, Inc." So that we put the correct name on the 278e and the ethics agreement, could you please confirm the name of the publishing company with which you contracted?

I'm hopeful that these will be our last questions!

Thanks very much,
Ed

* --- Please note that **a current or former employee who discloses information to an agency ethics official or a Government attorney does not

this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Tue, Jan 3, 2017 at 6:32 PM, Ryan Zinke (b) (6) wrote:

> Ed, attached is the version that legal has reviewed. Also, (b)(3), (6)

No attachment found in search

> all the best, z

>

> -----

> *From:* "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>

> *To:* ryanzinke <ryan.zinke@eopse.eop.gov>

> *Sent:* Tuesday, January 3, 2017 5:30 AM

> *Subject:* Re: Nominee OGE Form 278e

>

> Sounds great, Mr. Zinke!

>

> Ed

>

> * --- Please note that **a current or former employee who discloses
> information to an agency ethics official or a Government attorney does not
> personally enjoy an attorney-client privilege with respect to such
> communications. Additionally, **reliance on the oral or written advice
> of an agency ethics official cannot ensure that an employee will not be
> prosecuted for a violation of Title 18 of the United States Code. However,
> good faith reliance on such advice is a factor that may be taken into
> account by the Department of Justice in the selection of cases for
> prosecution. --- *

>

> **

> Ed McDonnell

> Alternate Designated Agency Ethics Official/Deputy Designated Agency

> Ethics Official

> U.S. Department of the Interior

> *Departmental Ethics Office*

> *Office of the Solicitor*

> E-mail: edward.mcdonnell@sol.doi.gov

> Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've

> sent me a fax as the fax machine is in a separate room.)*

> Located at:

> Main Interior Building

> Room 7348

> Office: (202) 208-5916

> Cell: (202) 510-8427

> Mailing Address:

> Departmental Ethics Office

> Office of the Solicitor

> Department of the Interior

> Mail Stop 7346

> 1849 C Street NW

> Washington, DC 20240

>

> *E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov

> <DOI_Ethics@sol.doi.gov> or visit us online at www.doi.gov/ethics

> <<http://www.doi.gov/ethics>>*

> This e-mail (including any attachments) is intended for the use of the
> individual or entity to which it is addressed. It may contain information
> that is privileged, confidential, or otherwise protected by applicable
> law. If you are not the intended recipient or the employee or agent
> responsible for delivery of this e-mail to the intended recipient, you are
> hereby notified that any dissemination, distribution, copying, or use of
> this e-mail or its contents is strictly prohibited. If you received this
> e-mail in error, please notify the sender immediately and destroy all
> copies.

>

> On Tue, Jan 3, 2017 at 12:23 AM, ryanzinke <(b) (6)> wrote:

>

> Thanks ed. I will call tomorrow. I think we are almost there. z

>

>

>

> Sent from my Verizon Wireless 4G LTE smartphone

>

Rest of chain partially released above

From: [Lorna A. Syme](#)
To: [Seth Jaffe](#)
Subject: FW: (b)(3), (6)
Date: Thursday, January 05, 2017 12:20:52 PM
Attachments: [ATT00001.txt](#)
[Zinke \(b\)\(3\), \(6\) pdf](#)
[image001.png](#)
[image002.png](#)

13 page attachment withheld in full - (b)(3), (4), (5), (6)

Seth:

Do you think we could discuss at your earliest convenience? (b) (5)

Thanks!

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Thursday, January 05, 2017 11:02 AM
To: Lorna A. Syme
Cc: Melinda J Loftin
Subject: Fwd: Book contract

Hi Lorna,

I got your voicemail and I understand.

We're ok with adding consulting fee for CDI.

Here is his book contract.

Per first paragraph and signature block on last page, Thomas Nelson is the publisher.

Paragraph 4 on page 4 is entitled ADVANCE. Publisher agreed to pay coauthor \$250K, under separate agreement, as an advance against all monies accruing to Author under the terms of the Agreement. Would OGE consider that to be an advance to him that should be included in his 278e?

He also receives 100 free copies of the book and a discount on books he purchases per paragraph 15 on page 10. I suspect that doesn't need to be reflected specifically/separately on the 278e but I thought I'd point it out.

Finally, could you please send Melinda and me a final copy of the 278e and EA that you're forwarding for preclearance?

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into

account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: ryanzinke (b) (6)

Date: Thu, Jan 5, 2017 at 9:23 AM

Subject: Fwd: (b)(3), (b) (6)

To: Edward McDonnell (u) (b)

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "DeVito, Vincent" (b) (6) >
Date: 05/01/2017 08:58 (GMT-05:00)
To: "The Hon. Ryan Zinke" (b) (6)
Subject: (b)(3), (6)

Attached

No attachment found in search

Vincent DeVito

Bowditch & Dewey, LLP | (b) (6) | (b) (6)
[Boston](#) | [Framingham](#) | [Washington, DC](#) | [Worcester](#)

www.bowditch.com | (b) (6) | [Bio](#) | 

Bowditch & Dewey

An invitation to read our blogs:

- [At the Bar with Bowditch: A Legal Blog for the Craft Brewing Community](#)
- [Campus Counsel](#)
- [Commercial Real Estate Insight & News](#)
- [Don't Tax Yourself](#)
- [LGBTQ Legal Issues](#)

This e-mail message is generated from the law firm of Bowditch & Dewey, LLP and contains information that is confidential and may be privileged as an attorney/client communication or as attorney work product. The information is intended to be disclosed solely to the addressee(s). If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this email information is prohibited. If you have received this email in error, please notify the sender by return email and delete it from your computer system. For more information about Bowditch & Dewey, please visit our web site at www.bowditch.com

From: [Lorna A. Syme](#)
To: ["McDonnell, Edward"](#)
Cc: ["Melinda J Loftin"](#)
Subject: Nominee
Date: Thursday, January 05, 2017 1:24:55 PM
Attachments: [278 for preclearance Zinke.pdf](#)
[ethics agreement for preclearance.docx](#)

11 page attachment withheld in full - (b)(3),
(4), (5), (6)

Versions for preclearance review. Please let me know asap if there are any concerns.

Thanks!

Lorna

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: [>>www.oge.gov<<](http://www.oge.gov)

Follow OGE on Twitter: @OfficeGovEthics

From: [Emory A. Rounds III](#)
To: [Lorna A. Syme](#)
Subject: Re: call
Date: Thursday, January 05, 2017 3:22:00 PM

Hold off for now please.

[Sent from my BlackBerry 10 smartphone on the Verizon Wireless 4G LTE network.](#)

From: Lorna A. Syme
Sent: Thursday, January 5, 2017 3:17 PM
To: Emory A. Rounds III
Subject: call

Hi Emory:

Just confirming that I can respond to a Deeno Laprageto (spelling?) from the transistion counsel's office on the status of Zinke?

Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: [>>www.oge.gov<<](http://www.oge.gov)
Follow OGE on Twitter: @OfficeGovEthics

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Fwd: Ethics approval
Date: Friday, January 06, 2017 8:39:16 AM
Attachments: [image1affd3.PNG](#)
[image8f5a41.PNG](#)
[ATT00001.txt](#)
[Zinke-House Ethics Approval Letter.pdf](#)

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: ryanzinke

(b) (6)

Date: Fri, Jan 6, 2017 at 7:36 AM
Subject: Fwd: Ethics approval
To: Edward McDonnell (b) (6)


Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "DeVito, Vincent" <(b) (6)>
Date: 05/01/2017 09:37 (GMT-05:00)
To: "The Hon. Ryan Zinke" (b) (6), Scott Hommel
(b) (6) >
Subject: Ethics approval

Attached.

No attachment found in search

Vincent DeVito
Bowditch & Dewey, LLP | (b) (6)
[Boston](#) | [Framingham](#) | [Washington, DC](#) | [Worcester](#)
www.bowditch.com | (b) (6) | [Bio](#) | 

Bowditch & Dewey

An invitation to read our blogs:

- [At the Bar with Bowditch: A Legal Blog for the Craft Brewing Community](#)
- [Campus Counsel](#)
- [Commercial Real Estate Insight & News](#)
- [Don't Tax Yourself](#)
- [LGBTQ Legal Issues](#)

This e-mail message is generated from the law firm of Bowditch & Dewey, LLP and contains information that is confidential and may be privileged as an attorney/client communication or as attorney work product. The information is intended to be disclosed solely to the addressee(s). If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this email information is prohibited. If you have received

From: [McDonnell, Edward](#)
To: [rvanzinke](#)
Cc: [Lorna A. Syme](#); [Melinda J Loftin](#)
Subject: Re: URGENT - Documents for Preclearance
Date: Friday, January 06, 2017 8:49:13 AM

Hi Mr. Zinke,

I've confirmed that the reporting period for outside positions includes 2014, 2015, and 2016 up to the date of filing (18 Dec). Accordingly, _____ need not be reported.

Thanks very much,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby

notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Fri, Jan 6, 2017 at 7:54 AM, ryanzinke (b) (6) > wrote:
Ed, it is accurate to the best of my knowledge. Z

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>

Date: 05/01/2017 15:14 (GMT-05:00)

To:

Cc: Melinda J Loftin <Melinda.Loftin@sol.doi.gov>, lasyme@oge.gov

Subject: URGENT - Documents for Preclearance

Hi Mr. Zinke,

One final check before these documents go to the Director of OGE for preclearance.

Please review them closely and as expeditiously as possible to ensure their accuracy.

Also, please note that the third paragraph of the ethics agreement indicates you will resign from your position with Great Northern Veterans Peace Park. Please understand that this is a requirement of the Transition Team. I wanted to bring it to your attention especially since you indicated on your Senate questionnaire that you would remain in this position.

Once you have blessed the documents, they will be sent to the Director of OGE for preclearance. Once the Director has precleared them, OGE will forward them to the Transition Team. OGE will then wait for direction from the Transition Team to forward the documents to the Senate.

If you have any questions or concerns, please let me know.

Thank you,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

From: [Lorna A. Syme](#)
To: ["McDonnell, Edward"](#)
Subject: cover letter language
Date: Friday, January 06, 2017 10:04:03 AM

Some suggested language:

(b) (5)



Lorna Syme
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9277
Facsimile: (202) 482-9237

Visit OGE's website: [>>www.oge.gov<<](http://www.oge.gov)
Follow OGE on Twitter: @OfficeGovEthics

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: PRECLEASED: Ryan Zinke
Date: Friday, January 06, 2017 12:55:11 PM

Got it. Thanks, Lorna!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Fri, Jan 6, 2017 at 12:40 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

2 page attachment withheld in full - (b)(3),
(4), (5), (6)

I apologize but the (b)(3), (6) had a dangling § symbol and they have asked me to correct it for the final. So please see attached corrected version.

Lorna

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Friday, January 06, 2017 11:19 AM
To: Melinda J Loftin
Cc: Lorna A. Syme
Subject: Re: PRECLEARED: Ryan Zinke

Hi Melinda,

Per Lorna, as soon as OGE tells us to, we will need to get Mr. Zinke to sign and date this precleared EA and go back into Integrity and re-sign (resubmit) his 278e.

Once he forwards us his signed and dated EA, we will then forward it, along with the attached OGE Nom Letter, to OGE.

I used sample language from Lorna to prepare the OGE Nom Letter.

As far as I understand, we don't have to prepare a Senate Nomination Letter for Mr. Zinke.

I'll let you know when I hear more.

Ed

--- Please note that a current or former employee who discloses information to an agency ethics

official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Fri, Jan 6, 2017 at 10:15 AM, Lorna A. Syme <lasyme@oge.gov> wrote:

The precleared ethics agreement is attached.

2 page attachment withheld in full - (b)(3), (4), (5), (6)

Thanks!

Lorna

From: Deborah J. Bortot
Sent: Friday, January 06, 2017 10:06 AM
To: 'Ann M Donaldson'
Cc: Lorna A. Syme; David J. Apol; Heather A. Jones; Sandra S. Mabry; Keith Labedz; Teresa L. Williamson; Rodrick T. Johnson; Emory A. Rounds III; 'Edward McDonnell'
Subject: PRECLEASED: Ryan Zinke

Annie, Ryan Zinke is precleared.

Lorna, please forward the ethics agreement to Annie.

Thanks!

Deb

Deborah J. Bortot
Chief, Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Ave., NW, Suite 500
Washington, DC 20005-3917
Telephone: (202) 482-9227
Facsimile: (202) 482-9237

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [McDonnell, Edward](#)
To: [Ryan Zinke](#)
Cc: [Melinda J Loftin](#); [Lorna A. Syme](#)
Subject: Re: Fwd: URGENT - Documents for Preclearance
Date: Monday, January 09, 2017 3:32:44 PM

Great! Thanks very much, Mr. Zinke!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Mon, Jan 9, 2017 at 3:10 PM, Ryan Zinke (b) (6) > wrote:

(b)(3), (6) . Z

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>
To: |
Cc: "lasyme@oge.gov" <lasyme@oge.gov>; Melinda J Loftin <Melinda.Loftin@sol.doi.gov>
Sent: Monday, January 9, 2017 10:17 AM
Subject: Fwd: URGENT - Documents for Preclearance

Hi Mr. Zinke,

Resending to be sure that you mean that you left these board positions in 2012. Is that correct?

Thank you,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. -

--

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official

U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building

Room 7348

Office: (202) 208-5916

Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office

Office of the Solicitor

Department of the Interior

Mail Stop 7346

1849 C Street NW

Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

----- Forwarded message -----

From: McDonnell, Edward <edward.mcdonnell@sol.doi.gov>

Date: Fri, Jan 6, 2017 at 9:12 AM

Subject: Re: URGENT - Documents for Preclearance

To: ryanzinke <ryanzinke@yahoo.com>

Cc: "lasyme@oge.gov" <lasyme@oge.gov>, Melinda J Loftin
<Melinda.Loftin@sol.doi.gov>

Mr. Zinke,

You left all of these positions in 2012, correct? If so, none are reportable on your 278e.

Thanks,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. -
--

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official

U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building

Room 7348

Office: (202) 208-5916

Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office

Office of the Solicitor

Department of the Interior

Mail Stop 7346

1849 C Street NW

Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Fri, Jan 6, 2017 at 9:04 AM, ryanzinke ^{(b) (6)} > wrote:

(b) (3), (6)

Sent from my Verizon Wireless 4G LTE smartphone

----- Original message -----

From: "McDonnell, Edward" <edward.mcdonnell@sol.doi.gov>

Date: 05/01/2017 15:14 (GMT-05:00)

To: _____

Cc: Melinda J Loftin <Melinda.Loftin@sol.doi.gov>, lasyme@oge.gov

Subject: URGENT - Documents for Preclearance

Hi Mr. Zinke,

One final check before these documents go to the Director of OGE for preclearance.

Please review them closely and as expeditiously as possible to ensure their accuracy.

Also, please note that the third paragraph of the ethics agreement indicates you will resign from your position with Great Northern Veterans Peace Park. Please understand that this is a requirement of the Transition Team. I wanted to bring it to your attention especially since you indicated on your Senate questionnaire that you would remain in this position.

Once you have blessed the documents, they will be sent to the Director of OGE for preclearance. Once the Director has precleared them, OGE will forward them to the Transition Team. OGE will then wait for direction from the Transition Team to forward the documents to the Senate.

If you have any questions or concerns, please let me know.

Thank you,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure

that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official

U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 *(Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)*

Located at:

Main Interior Building

Room 7348

Office: (202) 208-5916

Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office

Office of the Solicitor

Department of the Interior

Mail Stop 7346

1849 C Street NW

Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: Ryan Zinke
Date: Tuesday, January 10, 2017 9:59:28 AM

Thanks, Lorna. We're on it!!!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Tue, Jan 10, 2017 at 9:51 AM, Lorna A. Syme <lasyme@oge.gov> wrote:

We have received word from the transition team authorizing us to forward Representative Zinke's paperwork to the Senate Committee. Please have the filer sign/date the ethics agreement and submit his 278e report in Integrity. Your DAEO or ADAEO should certify the report in Integrity and then forward the signed ethics agreement and your agency cover letter to us at your earliest convenience. Let me know if you have any questions.

Thank you.

Lorna

Lorna Syme

Presidential Nominations Branch

U.S. Office of Government Ethics

1201 New York Ave., NW, Suite 500

Washington, DC 20005-3917

Telephone: (202) 482-9277

Facsimile: (202) 482-9237

Visit OGE's website: >>www.oge.gov<<

Follow OGE on Twitter: @OfficeGovEthics

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Lorna A. Syme](#)
To: [Deborah J. Bortot](#); [Teresa L. Williamson](#); [Sandra S. Mabry](#)
Subject: RE: Representative Ryan Zinke
Date: Tuesday, January 10, 2017 11:09:53 AM

I've already contacted them and asked them to get us the paperwork asap.

-----Original Message-----

From: Deborah J. Bortot
Sent: Tuesday, January 10, 2017 11:09 AM
To: Teresa L. Williamson; Lorna A. Syme; Sandra S. Mabry
Subject: FW: Representative Ryan Zinke

-----Original Message-----

From: Ann M Donaldson (b) (6)
Sent: Tuesday, January 10, 2017 9:34 AM
To: Deborah J. Bortot; Heather A. Jones
Subject: Representative Ryan Zinke

On behalf of the President-Elect, this email serves as confirmation that the President-Elect intends to nominate Representative Ryan Zinke to be Secretary of the Interior. Please transmit his pre-cleared 278 report to the appropriate Senate committee.

Thank you,
Annie

Ann M. Donaldson
Associate
JONES DAY® - One Firm Worldwide
51 Louisiana Avenue, NW
Washington, DC 20001
Office +1 (b) (6)

From: [Lorna A. Syme](#)
To: [Teresa L. Williamson](#)
Subject: FW: Nominee Paperwork
Date: Tuesday, January 10, 2017 3:39:14 PM
Attachments: [Zinke, Ryan - Ethics Agreement.pdf](#)
[Zinke, Ryan - OGE Nom Letter.pdf](#)

Attachments released below

From: McDonnell, Edward [mailto:edward.mcdonnell@sol.doi.gov]
Sent: Tuesday, January 10, 2017 3:20 PM
To: Lorna A. Syme
Cc: Margaret Bradley; Melinda J Loftin
Subject: Nominee Paperwork

Hi Lorna,

Documents attached.

Thanks!

Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:
Departmental Ethics Office
Office of the Solicitor
Department of the Interior

Mail Stop 7346
1849 C Street NW
Washington, DC 20240

*E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online
at www.doi.gov/ethics*

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.



United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

IN REPLY REFER TO:

January 10, 2017

Honorable Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, D.C. 20005-3917

Dear Mr. Shaub:

I have reviewed the Public Financial Disclosure Report (OGE Form 278e), dated December 18, 2016, submitted by Mr. Ryan Zinke, in connection with President-Elect Trump's intent to nominate Mr. Zinke to serve as Secretary of the Department of the Interior.

Also, enclosed is a letter from Mr. Zinke that specifies certain actions that he will take in connection with ethics matters if confirmed as Secretary.

Based on my review of Mr. Zinke's OGE Form 278e and the enclosed letter, it is my opinion that the report is complete and discloses no conflicts of interest under applicable laws and regulations.

If you have any questions concerning this matter, please contact me at (202) 208-7960.

Sincerely,

Melinda J. Loftin
Designated Agency Ethics Official
Director, Ethics Office

Enclosure
As stated

January 10, 2017

Melinda Loftin
Designated Agency Ethics Official
and Director, Ethics Office
U.S. Department of the Interior
1849 C Street, NW, MS 7346
Washington, DC 20240

Dear Ms. Loftin:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the Department of Interior.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with Great Northern Veterans Peace Park Foundation. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with Continental Divide International, LLC, and become a non-managing member of this entity. During my appointment to the position of Secretary, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Continental Divide International, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position with Double Tap, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter

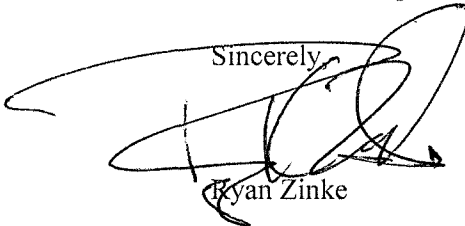
that to my knowledge has a direct and predictable effect on the financial interests of Double Tap, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I receive royalties from Thomas Nelson for sales of my book, *American Commander: Serving a Country Worth Fighting For and Training the Brave Soldiers Who Lead the Way*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Thomas Nelson is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse has a vested beneficial interest in, and receives property management fees from, a family trust with underlying assets consisting of rental properties and an undeveloped lot, all of which are located in Santa Barbara, CA. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of this trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

If I am confirmed as Secretary of the Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the Department of the Interior extended to me by supplemental regulation 5 C.F.R. § 3501.103.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Ryan Zinke

From: LNAPPS1.USOGE@oge.gov
To: [Sandra S. Mabry](#)
Subject: IMPORTANT - ACTION NEEDED - Nomination Package Forwarded to Sandy for Review - Ryan Zinke
Date: Tuesday, January 10, 2017 3:46:46 PM

Nomination package for Ryan Zinke has been forwarded for review.

ACTION: Review nomination package and initial paper routing slip. Log completion of this step into FDTS by clicking the forward routing button to save and mark this step complete.

Drop the paper folder off in General Counsel's office.

The link below will take you to the FDTS record.

(b) (6)

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Notification
Date: Tuesday, January 10, 2017 4:12:49 PM

Hi Lorna,

I'll be leaving the office now so, if you could email me (rather than try calling my office phone) notification that the nominee's package has been forwarded to the Senate, I'd appreciate it!

Thanks,
Ed

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI_Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

From: [Edward McDonnell](#)
To: [Lorna A. Syme](#)
Cc: [Melinda J Loftin](#)
Subject: I went into Integrity and it shows the report as being at OGE for certification.
Date: Tuesday, January 10, 2017 4:36:56 PM

Sent from my iPhone

From: [McDonnell, Edward](#)
To: [Lorna A. Syme](#)
Subject: Re: Public Financial Disclosure Report of Ryan Zinke
Date: Wednesday, January 11, 2017 3:40:29 PM

Thanks so much, Lorna! You're the best!!!

--- Please note that a current or former employee who discloses information to an agency ethics official or a Government attorney does not personally enjoy an attorney-client privilege with respect to such communications. Additionally, reliance on the oral or written advice of an agency ethics official cannot ensure that an employee will not be prosecuted for a violation of Title 18 of the United States Code. However, good faith reliance on such advice is a factor that may be taken into account by the Department of Justice in the selection of cases for prosecution. ---

Ed McDonnell

Alternate Designated Agency Ethics Official/Deputy Designated Agency Ethics Official
U.S. Department of the Interior

Departmental Ethics Office

Office of the Solicitor

E-mail: edward.mcdonnell@sol.doi.gov

Fax: (202) 208-5515 (Please call or e-mail me to let me know you've sent me a fax as the fax machine is in a separate room.)

Located at:

Main Interior Building
Room 7348
Office: (202) 208-5916
Cell: (202) 510-8427

Mailing Address:

Departmental Ethics Office
Office of the Solicitor
Department of the Interior
Mail Stop 7346
1849 C Street NW
Washington, DC 20240

E-mail the Departmental Ethics Office at DOI.Ethics@sol.doi.gov or visit us online at www.doi.gov/ethics

This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed. It may contain information that is privileged, confidential, or otherwise protected by applicable law. If you are not the intended recipient or the employee or agent responsible for delivery of this e-mail to the intended recipient, you are hereby notified that any dissemination, distribution, copying, or use of this e-mail or its contents is strictly prohibited. If you received this e-mail in error, please notify the sender immediately and destroy all copies.

On Wed, Jan 11, 2017 at 2:55 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Ed:

Just FYI. We sent the documents to the committee yesterday. This is your courtesy copy.

Lorna

From: Teresa L. Williamson
Sent: Wednesday, January 11, 2017 2:54 PM
To: Lorna A. Syme; 'McDonnell, Edward'
Subject: Public Financial Disclosure Report of Ryan Zinke

Good Afternoon,

Final EA and final senate letter released below.
278 financial disclosure report withheld in full - (b)
(3) - Available at <https://extapps2.oge.gov/201/Presiden.nsf/PAS%20Index?OpenView>

I've attached the financial disclosure package for Ryan Zinke. President-Elect Trump has announced his intention to nominate Mr. Zinke for the position of Secretary, Department of the Interior.

Thanks!

Teresa Williamson
Presidential Nominations Branch
U.S. Office of Government Ethics
1201 New York Avenue, NW - Suite 500
Washington, DC 20005
202-482-9283

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged,

From: [Edward McDonnell](#)
To: [Hommel, Scott](#)
Cc: [Lorna A. Syme](#); [Ryan Zinke](#); [Melinda J Loftin](#)
Subject: Re: 5 Day Letter
Date: Friday, January 13, 2017 4:57:26 PM

You're very welcome, Scott, and thank you and Mr. Zinke for all you've done through this process!

Sent from my iPhone

On Jan 13, 2017, at 4:53 PM, Hommel, Scott (b) (6) > wrote:

Thank you.

From: Edward McDonnell [<mailto:edward.mcdonnell@sol.doi.gov>]
Sent: Friday, January 13, 2017 4:47 PM
To: Lorna A. Syme
Cc: Ryan Zinke; Hommel, Scott; Melinda J Loftin
Subject: Re: 5 Day Letter

Thank you, Lorna!!!

Sent from my iPhone

On Jan 13, 2017, at 4:44 PM, Lorna A. Syme <lasyme@oge.gov> wrote:

Got it – thanks!

From: Edward McDonnell [<mailto:edward.mcdonnell@sol.doi.gov>]
Sent: Friday, January 13, 2017 4:39 PM
To: Lorna A. Syme
Cc: Melinda J Loftin; Ryan Zinke; Scott Hommel
Subject: Fwd: 5 Day Letter

Hi Lorna,

Forwarding Director Shaub's copy of Mr. Zinke's 5-day letter. If you would verify receipt (and that PDF transferred properly) I would greatly appreciate it.

Thanks so much!

Ed

Sent from my iPhone

Begin forwarded message:

From: "Hommel, Scott"

(b) (6)

Date: January 13, 2017 at 4:30:17 PM EST

To: Edward McDonnell

(b) (6)

>

Subject: 5 Day Letter

No attachment found in search

Ed,

Please see attached. Original signed and notarized letter and a copy being hand delivered right now as instructed. Please confirm receipt. Thanks.

Scott

Scott C. Hommel
Chief of Staff
Rep. Ryan Zinke – Montana

(b) (6)

OGE Confidential Notice: This email, including all attachments, may constitute a Federal record or other Government property that is intended only for the use of the individual or entity to which it is addressed. This email also may contain information that is privileged, confidential, or otherwise protected from disclosure under applicable law. If you are not the intended recipient or the employee or agent responsible for delivering the transmission to the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this email or its contents is strictly prohibited. If you have received this email in error, please notify the sender by responding to the email and then immediately delete the email.

From: [Teresa L. Williamson](#)
To: [Lorna A. Syme](#)
Subject: FW: NEW NOMINATION - January 20, 2017
Date: Wednesday, January 25, 2017 1:32:07 PM
Importance: High

From: Teresa L. Williamson
Sent: Monday, January 23, 2017 10:58 AM
To: Lorna A. Syme; Rachel K. Dowell; Sandra S. Mabry; Keith Labedz; Leigh J. Francis; Jim Robertson; Jack MacDonald; Stephanie Nonluecha; Megan V. Khaner; Patrick J. Lightfoot; Kimberly L. Sikora Panza; Elaine Newton; Monica M. G. Ashar
Cc: LEGTEAM; Emory A. Rounds III; Brandon L. Bunderson; Vincent Salamone; Steven Corbally; Grace A. Clark; Cheryl L. Kane-Piasecki; Deborah J. Bortot; Dale A. Christopher; Nicole Stein; Daniel L. Skalla; Elizabeth D. Horton; Wendy G. Pond; Heather A. Jones; Diana Veilleux; Seth Jaffe; David A. Meyers; Ciara M. Guzman; Patrick Shepherd; Rodrick T. Johnson; Kimberley H. Kaplan; Christopher J. Swartz; Jaideep Mathai
Subject: NEW NOMINATION - January 20, 2017
Importance: High

The following nominations have been posted on THOMAS. You will be contacted separately regarding any actions required regarding these nominations.

Thanks! Teresa

NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY) (b) (5)
(b) (5)

PN49 — 115th Congress (2017-2018) — **Seema Verma** — **Department of Health and Human Services**
Seema Verma, of Indiana, to be Administrator of the Centers for Medicare and Medicaid Services, vice Marilyn B. Tavenner.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Kim Sikora Panza (INTEGRITY) (b) (5)
(b) (5)

PN53 — 115th Congress (2017-2018) — **David Friedman** — **Department of State**
David Friedman, of New York, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to Israel.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Leigh (INTEGRITY) (b) (5)
(b) (5)

PN45 — 115th Congress (2017-2018) — **Todd M. Ricketts** — **Department of Commerce**

Todd M. Ricketts, of Illinois, to be Deputy Secretary of Commerce.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY) (b) (5)
(b) (5)

PN42 — 115th Congress (2017-2018) — **Robert Lighthizer** — **Executive Office of the President**

Robert Lighthizer, of Florida, to be United States Trade Representative, with the rank of Ambassador Extraordinary and Plenipotentiary.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)
(b) (5)

PN39 — 115th Congress (2017-2018) — **David J. Shulkin** — **Department of Veterans Affairs**

David J. Shulkin, of Pennsylvania, to be Secretary of Veterans Affairs.

Date Received from President: 01/20/2017

Committee: Veterans' Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Veterans' Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Elaine (INTEGRITY) (b) (5)

PN38 — 115th Congress (2017-2018) — **Andrew F. Puzder** — **Department of Labor**

Andrew F. Puzder, of Tennessee, to be Secretary of Labor.

Date Received from President: 01/20/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - (b) (5)

PN52 — 115th Congress (2017-2018) — **Terry Branstad** — **Department of State**

Terry Branstad, of Iowa, to be Ambassador Extraordinary and Plenipotentiary of the United States of America to the People's Republic of China.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - (b) (5)

PN47 — 115th Congress (2017-2018) — **Jay Clayton** — **Securities and Exchange Commission**

Jay Clayton, of New York, to be a Member of the Securities and Exchange Commission for a term expiring June 5, 2021, vice Daniel M. Gallagher, Jr. (term expired).

Date Received from President: 01/20/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - (b) (5)

PN46 — 115th Congress (2017-2018) — **Vincent Viola** — **Department of Defense**

Vincent Viola, of New York, to be Secretary of the Army, vice Eric Kenneth Fanning.

Date Received from President: 01/20/2017

Committee: Armed Services

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Armed Services. ([All Actions](#))

NOMINATION - (b) (5)

PN41 — 115th Congress (2017-2018) — **Daniel Coats** — **Office of the Director of National Intelligence**

Daniel Coats, of Indiana, to be Director of National Intelligence, vice James R. Clapper, Jr.

Date Received from President: 01/20/2017

Committee: Intelligence

Latest Action: 01/20/2017 - Received in the Senate and referred to the Select Committee on Intelligence. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)

PN28 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **International Monetary Fund**

Steven T. Mnuchin, of California, to be United States Governor of the International Monetary Fund, United States Governor of the African Development Bank, United States Governor of the Inter-American Development Bank, and United States Governor of the International Bank for Reconstruction and Development for a term of five years, vice Jacob Joseph Lew, resigned.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)

(b) (5)

PN27 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **European Bank for Reconstruction and Development**

Steven T. Mnuchin, of California, to be United States Governor of the European Bank for Reconstruction and Development, United States Governor of the African Development Fund, and United States Governor of the Asian Development Bank, vice Jacob Joseph Lew, resigned.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)

PN26 — 115th Congress (2017-2018) — **Steven T. Mnuchin** — **Department of the Treasury**

Steven T. Mnuchin, of California, to be Secretary of the Treasury.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY) (b) (5)

PN51 — 115th Congress (2017-2018) — **Nikki R. Haley** — **United Nations**

Nikki R. Haley, of South Carolina, to be Representative of the United States of America to the Sessions of the General Assembly of the United Nations during her tenure of service as Representative of the United States of America to the United Nations.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY) (b) (5)

PN50 — 115th Congress (2017-2018) — **Nikki R. Haley** — **Department of State**

Nikki R. Haley, of South Carolina, to be the Representative of the United States of America to the United Nations, with the rank and status of Ambassador Extraordinary and Plenipotentiary, and the Representative of the United States of America in the Security Council of the United Nations.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

NOMINATION - OGE Reviewer: Rachel (INTEGRITY) (b) (5)

PN48 — 115th Congress (2017-2018) — **Linda E. McMahon** — **Small Business Administration**

Linda E. McMahon, of Connecticut, to be Administrator of the Small Business Administration, vice Maria Contreras-Sweet, resigned.

Date Received from President: 01/20/2017

Committee: Small Business and Entrepreneurship

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Small Business and Entrepreneurship. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY) (b) (5)

PN44 — 115th Congress (2017-2018) — **Scott Pruitt** — **Environmental Protection Agency**

Scott Pruitt, of Oklahoma, to be Administrator of the Environmental Protection Agency.

Date Received from President: 01/20/2017

Committee: Environment and Public Works

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Environment and Public Works. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)

PN43 — 115th Congress (2017-2018) — **Mike Pompeo** — **Central Intelligence Agency**

Mike Pompeo, of Kansas, to be Director of the Central Intelligence Agency, vice John Owen Brennan.

Date Received from President: 01/20/2017

Committee: Intelligence

Latest Action: 01/20/2017 - Considered by Senate. ([All Actions](#))

NOMINATION - OGE Reviewer: Stephanie (INTEGRITY) (b) (5)

PN40 — 115th Congress (2017-2018) — **John F. Kelly** — **Department of Homeland Security**

John F. Kelly, of Virginia, to be Secretary of Homeland Security.

Date Received from President: 01/20/2017

Latest Action: 01/20/2017 - **Confirmed by the Senate** by Yea-Nay Vote. 88 - 11. Record Vote Number: 30. ([All Actions](#))

NOMINATION - OGE Reviewer: Megan (INTEGRITY) (b) (5)

PN37 — 115th Congress (2017-2018) — **Elisabeth Prince DeVos** — **Department of Education**

Elisabeth Prince DeVos, of Michigan, to be Secretary of Education.

Date Received from President: 01/20/2017

Committee: Health, Education, Labor, and Pensions

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Health, Education, Labor, and Pensions. ([All Actions](#))

NOMINATION - OGE Reviewer: Jim (INTEGRITY) (b) (5)

PN36 — 115th Congress (2017-2018) — **James Richard Perry** — **Department of Energy**

James Richard Perry, of Texas, to be Secretary of Energy.

Date Received from President: 01/20/2017

Committee: Energy and Natural Resources

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. ([All Actions](#))

NOMINATION - OGE Reviewer: Sandy (INTEGRITY) (b) (5)

PN35 — 115th Congress (2017-2018) — **Elaine L. Chao** — **Department of Transportation**

Elaine L. Chao, of Kentucky, to be Secretary of Transportation.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Monica (INTEGRITY) (b) (5)

PN34 — 115th Congress (2017-2018) — **Benjamin S. Carson Sr.** — **Department of Housing and Urban Development**

Benjamin S. Carson, Sr., of Florida, to be Secretary of Housing and Urban Development.

Date Received from President: 01/20/2017

Committee: Banking, Housing, and Urban Affairs

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Banking, Housing, and Urban Affairs. ([All Actions](#))

NOMINATION - OGE Reviewer: Patrick (INTEGRITY) (b) (5)

PN33 — 115th Congress (2017-2018) — **Thomas Price** — **Department of Health and Human Services**

Thomas Price, of Georgia, to be Secretary of Health and Human Services.

Date Received from President: 01/20/2017

Committee: Finance

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Finance. ([All Actions](#))

NOMINATION - OGE Reviewer: Keith (INTEGRITY) (b) (5)

PN32 — 115th Congress (2017-2018) — **Wilbur L. Ross Jr.** — **Department of Commerce**

Wilbur L. Ross, Jr., of Florida, to be Secretary of Commerce.

Date Received from President: 01/20/2017

Committee: Commerce, Science, and Transportation

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Commerce, Science, and Transportation. ([All Actions](#))

NOMINATION - OGE Reviewer: Lorna (INTEGRITY) (b) (5)

[PN31](#) — 115th Congress (2017-2018) — **Ryan Zinke** — **Department of the Interior**

Ryan Zinke, of Montana, to be Secretary of the Interior.

Date Received from President: 01/20/2017

Committee: Energy and Natural Resources

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Energy and Natural Resources. ([All Actions](#))

NOMINATION - OGE Reviewer: Jack (*INTEGRITY*) (b) (5)

[PN30](#) — 115th Congress (2017-2018) — **Jeff Sessions** — **Department of Justice**

Jeff Sessions, of Alabama, to be Attorney General.

Date Received from President: 01/20/2017

Committee: Judiciary

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on the Judiciary. ([All Actions](#))

NOMINATION - OGE Reviewer: Monica (*INTEGRITY*) (b) (5)

[PN29](#) — 115th Congress (2017-2018) — **James Mattis** — **Department of Defense**

James Mattis, of Washington, to be Secretary of Defense.

Date Received from President: 01/20/2017

Latest Action: 01/20/2017 - **Confirmed by the Senate** by Yea-Nay Vote. 98 - 1. Record Vote Number: 29. ([All Actions](#))

NOMINATION - OGE Reviewer: Leigh (*INTEGRITY*) (b) (5)

[PN25](#) — 115th Congress (2017-2018) — **Rex W. Tillerson** — **Department of State**

Rex W. Tillerson, of Texas, to be Secretary of State.

Date Received from President: 01/20/2017

Committee: Foreign Relations

Latest Action: 01/20/2017 - Received in the Senate and referred to the Committee on Foreign Relations. ([All Actions](#))

UNITED STATES OFFICE OF
GOVERNMENT ETHICS



JAN 10 2017

The Honorable Lisa Murkowski
Chairman
Committee on Energy and Natural
Resources
United States Senate
Washington, DC 20510

Dear Madam Chairman:

In accordance with the Ethics in Government Act of 1978, I enclose a copy of the financial disclosure report filed by Ryan Zinke. President-Elect Trump has announced his intention to nominate Mr. Zinke for the position of Secretary, Department of the Interior.

We have reviewed the report and have obtained advice from the agency concerning any possible conflict in light of its functions and the nominee's proposed duties. Also enclosed is an ethics agreement outlining the actions that the nominee will undertake to avoid conflicts of interest. Unless a date for compliance is indicated in the ethics agreement, the nominee must fully comply within three months of confirmation with any action specified in the ethics agreement.

Based thereon, we believe that this nominee is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

A handwritten signature in blue ink, reading "Walter M. Shaub, Jr.".

Walter M. Shaub, Jr.
Director

Enclosures

January 10, 2017

Melinda Loftin
Designated Agency Ethics Official
and Director, Ethics Office
U.S. Department of the Interior
1849 C Street, NW, MS 7346
Washington, DC 20240

Dear Ms. Loftin:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the Department of Interior.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with Great Northern Veterans Peace Park Foundation. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with Continental Divide International, LLC, and become a non-managing member of this entity. During my appointment to the position of Secretary, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Continental Divide International, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position with Double Tap, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter

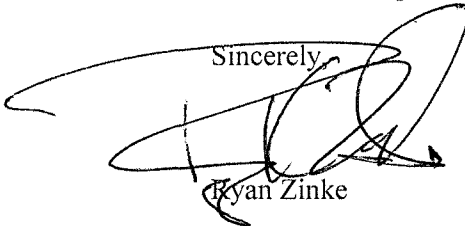
that to my knowledge has a direct and predictable effect on the financial interests of Double Tap, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I receive royalties from Thomas Nelson for sales of my book, *American Commander: Serving a Country Worth Fighting For and Training the Brave Soldiers Who Lead the Way*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Thomas Nelson is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse has a vested beneficial interest in, and receives property management fees from, a family trust with underlying assets consisting of rental properties and an undeveloped lot, all of which are located in Santa Barbara, CA. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of this trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

If I am confirmed as Secretary of the Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the Department of the Interior extended to me by supplemental regulation 5 C.F.R. § 3501.103.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Ryan Zinke

Ryan K. Zinke

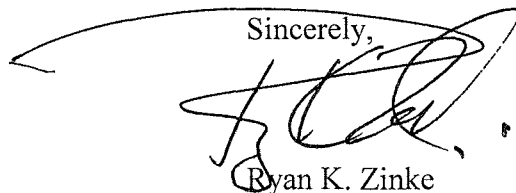
January 13, 2017

The Honorable Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, N.W.
Suite 500
Washington, D.C. 20005-3917

Dear Mr. Shaub:

As required by 5 CFR 2634.606(a), I hereby submit a true copy of my amendment and certification to the Senate Committee on Energy and Natural Resources. The amendment makes current, as of this date, the information contained in my Financial Disclosure Report (OGE Form 278e) dated December 18, 2016, with respect to outside earned income and honoraria as required by Section 101(b)(1) of the Ethics Reform Act of 1989.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Zinke", with a large, sweeping flourish extending from the top left of the signature.

Ryan K. Zinke

Enclosure

Ryan K. Zinke

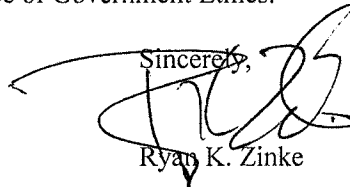
January 13, 2017

The Honorable Lisa Murkowski
Chairman, U.S. Senate Committee on Energy and Natural Resources
United States Senate
Washington, D.C. 20510

Dear Madam Chairman:

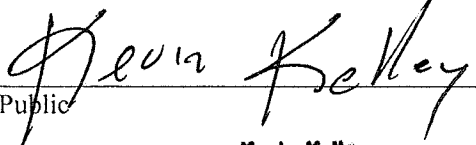
Pursuant to Section 101(b)(1) of the Ethics Reform Act of 1989, I hereby certify and report that the information required by 5 CFR 2634.606(a) with respect to outside earned income and honoraria, as set forth in my Financial Disclosure Report (OGE Form 278e) dated December 18, 2016, is current as of this day.

I further certify that I have transmitted copies of this report to the Designated Agency Ethics Official of the Department of the Interior and to the U.S. Office of Government Ethics.

Sincerely,

Ryan K. Zinke

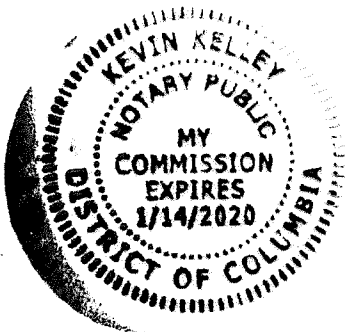
Washington)
District of Columbia)ss
)

Subscribed and sworn before me on this 13 day of January, 2017.


Notary Public

My commission expires: **Kevin Kelley**
Notary Public, District of Columbia
My Commission Expires 1/14/2020

cc: The Honorable Maria Cantwell, Ranking Member
The Honorable Walter M. Shaub, Jr., Director, U.S. Office of Government Ethics
Melinda J. Loftin, Designated Agency Ethics Official, Department of the Interior



[date]

Melinda Loftin
Designated Agency Ethics Official
and Director, Ethics Office
U.S. Department of the Interior
1849 C Street, NW, MS 7346
Washington, DC 20240

Dear Ms. Loftin:

Deleted: my

Deleted: |

(b) (5)

Deleted: ¶

Sincerely,

[date]

Melinda Loftin
Designated Agency Ethics Official
and Director, Ethics Office
U.S. Department of the Interior
1849 C Street, NW, MS 7346
Washington, DC 20240

Dear Ms. Loftin:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Secretary of the Department of Interior.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with Great Northern Veterans Peace Park Foundation. For a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know this entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

Upon confirmation, I will resign from my positions with Continental Divide International, LLC, and become a non-managing member of this entity. During my appointment to the position of Secretary, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Continental Divide International, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

Upon confirmation, I will resign from my position with Double Tap, LLC, and I will become a non-managing member of this entity. During my appointment, I will not manage this entity or provide any other services to it. Instead, I will receive only passive investment income from it. As Secretary, I will not participate personally and substantially in any particular matter

that to my knowledge has a direct and predictable effect on the financial interests of Double Tap, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

I receive royalties from Thomas Nelson for sales of my book, *American Commander: Serving a Country Worth Fighting For and Training the Brave Soldiers Who Lead the Way*. I will not participate personally and substantially in any particular matter involving specific parties in which I know Thomas Nelson is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

My spouse has a vested beneficial interest in, and receives property management fees from, a family trust with underlying assets consisting of rental properties and an undeveloped lot, all of which are located in Santa Barbara, CA. As Secretary, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of this trust, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

If I am confirmed as Secretary of the Department of the Interior, I am aware that I am prohibited by 30 U.S.C. § 1211(f) from holding a financial interest in any surface or underground coal mining operation. Additionally, I am aware that my position is subject to the prohibitions against holding any financial interest in federal lands or resources administered or controlled by the Department of the Interior extended to me by supplemental regulation 5 C.F.R. § 3501.103.

Finally, I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Ryan Zinke

January X, 2017

Honorable Walter M. Schaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, D.C. 20005-3917

Dear Mr. Schaub:

I have reviewed the Public Financial Disclosure Report (OGE Form 278e), dated December 18, 2016, submitted by Mr. Ryan Zinke, in connection with President-Elect Trump's intent to nominate Mr. Zinke to serve as Secretary of the Department of the Interior.

Also, enclosed is a letter from Mr. Zinke that specifies certain actions that he will take in connection with ethics matters if confirmed as Secretary.

Based on my review of Mr. Zinke's OGE Form 278e and the enclosed letter, it is my opinion that the report is complete and discloses no conflicts of interest under applicable laws and regulations.

If you have any questions concerning this matter, please contact me at (202) 208-7960.

Sincerely,

Melinda J. Loftin
Designated Agency Ethics Official
Director, Ethics Office

Enclosure
As stated

University of Oregon
06/1984

08/1980-06/1984

BS Geology

8. Employment: Please list, in chronological order, from the earliest to the present, all positions held since college, including dates of employment, your title or job description, the name of the employer, and the city and state in which you were employed.

Dates	Title	Name of employer	Location
01/2015- Present	Congressman	U.S. House of Representatives	Montana & D.C.
02/2008- Present	CEO	Self-employed Continental Divide International Residential Rental Property Consultant in energy, defense & tech until 2015 (Save the World Air was a client until 2015)	Whitefish MT
02/2007- Present	President	Great Northern Veterans Peace Park Foundation 501 c (3). Unpaid position	Whitefish MT
02/2013- Present	Officer	Double Tap LLC Residential Rental Property	Whitefish MT
2012	Consultant	Neil Livingstone	Helena MT
06/2010- 01/2015	Consultant	On Point Montana No longer have financial interest	Whitefish MT
06/2010	Consultant	Win Tec No longer have financial interest	Fort Washington MD
02/1985- 02/2008	Naval Officer	United States Navy Retired from active duty	

9. Military service: Please describe any military service not listed above, including dates, rank, and type of discharge.

United States Navy. 02/1985-02/2008. SEAL Officer. Retired as rank of Commander with Honorable Discharge

10. Honors and awards: Please list any scholarships, fellowships, honorary degrees, military medals, honorary society memberships, and any other special recognition for outstanding service or achievement you have received.

Military: Bronze Star (2), Defense Meritorious SVC Medal (2), Meritorious Service Medal (4), Joint Service Commendation SVC Medal (2), Army Commendation Medal, Navy/Marine Corps Commendation Medal (2), Navy/Marine Corps Achievement Medal (3), Combat Action Ribbon, Joint Meritorious Unit Commendation, Meritorious Unit Commendation, National Defense SVC Medal (2), Armed Forces Expeditionary Medal, Global War on Terrorism Expeditionary Medal, Kosovo Campaign Medal, Iraqi Campaign Medal, Armed Forces SVC Medal, Humanitarian SVC Medal, Navy/Marine Corps deployment Medal (3), Navy/Marine Corps Overseas SVC Ribbon, NATO Medal, Expert Rifleman Medal, Expert Pistol Medal, Special Warfare Insignia (SEAL).

Legislative: Chamber of Commerce Spirit of Enterprise Award 2016, National Retail Federation Hero of Main Street Award 2015, International Foodservice Distributors Association 2016 Thomas Jefferson Award, National Federation of Independent Businesses 2016 Guardians of Small Business Award, Rural Schools legislator of the Year Award, National Association of Community Health Centers 2016 Rising Community Health Leader

College: 1983 Pac TEN All Conference, 1984 Pacific 10 Conference Medal, 1984 University of Oregon Emerald Athletic Award for most outstanding Oregon athlete and citizen, 1984 University of Oregon Sahlstrom Award as the senior maintaining an outstanding academic record who has demonstrated an exemplary attitude as well as tremendous contribution on the field. Scholarship player Oregon Ducks varsity football team.

Other: Outstanding Young Man of America 1996, 1997

11. Publications: Please list the titles, publishers, and dates of any books, articles, or reports that you have written.

Books: American Commander. November 2016

Dozens of editorials in Montana newspapers, FoxNews.com, Washington Post, The Hill, Washington Times, Breitbart, and others. See attached document.

12. Testimony: Please identify each instance in which you have testified before Congress in a non-governmental capacity.

Subject of testimony	Committee	Date
----------------------	-----------	------

None.

13. Financial report: Please attach a copy of your Executive Branch Personnel Public Financial Disclosure Report (SF 278), and a statement from the appropriate agency ethics official explaining the applicable laws or regulations applicable to the position to which you have been nominated, any potential conflicts of interest, and any action required to resolve such conflicts.

14. Clients: At any time during the past 5 years, have you or any company or firm with which you have been affiliated, received a fee or payment of more than \$5,000 from any source that is not listed on Schedule D, Part II of your SF 278, for services you performed for that source? If so, Please identify the source of the payments, the nature of the service you performed, and the period of time when you performed the service.

None.

ADDITIONAL QUESTIONS

15. Agreements or arrangements:

(a) Will you sever all connections with your present employer, business firm, association, or organization if you are confirmed by the Senate? If not, please explain. I will resign from the US House of Representatives upon confirmation. Continental Divide International LLC and Double Tap LLC, both family held residential rental property LLCs will be maintained. In both cases, however, I will resign from all managing director roles. In regard to non-paid position in the Great Northern Veterans Peace Park (GNVPP) Foundation 501 c (3), I intend to maintain the present position and role. The mission of the GNVPP is to maintain a children's sledding park and community open space in Whitefish, MT. All positions are volunteer.

(b) Has anyone made a commitment to you to employ or compensate you after you leave public service? If so, please explain. No one has made a commitment to employ or compensate.

16. Term of service: If confirmed, are you willing and able to serve for your full term (if appointed for a fixed term) or until the end of the current Presidential Administration (if appointed for an indefinite term)? If not, please explain. Yes

17. Legal proceedings:

(a) Are you currently a party to any legal action? If so, please describe its nature and status. Yes, Civil action. 10/21/2016. Landlord-tenant dispute. DC Superior Court. Principal parties: ST Sophia Greek Orthodox Cathedral and Ryan and Lolita Zinke. Our claim was rental house was unsafe for our Mother who was ill.

(b) Have you ever declared bankruptcy? If so, please describe the circumstances. No

(c) Have you ever been investigated, arrested, or charged by any federal, state, or local law enforcement authority for the violation of any federal, state, or local law, regulation, or ordinance, other than a minor traffic offense? If so, please explain. No

(d) Have you ever been convicted (including a plea of guilty or no contest) of any criminal violation other than a minor traffic offense? If so, please explain. No

(e) Have you ever been disciplined or cited for a breach of ethics for unprofessional conduct by, or been the subject of a complaint to, any court, administrative agency, professional association, disciplinary committee, or other professional group? If so, please explain. No

18. Taxes:

(a) Have you and your spouse filed all federal, state, and local income tax returns? Yes

(b) Have you or your spouse ever filed a late income tax return without a valid extension? If so, please explain. No

(c) Have you or your spouse ever paid any tax penalties or been subject to a tax lien or other tax collection procedure? If so, please explain. No

19. Foreign ties:

(a) Have you or your spouse ever represented in any capacity (e.g., employee, attorney, accountant, consultant, or business, media, or political adviser), with or without compensation, a foreign government or an entity controlled by a foreign government? If so, please fully describe such relationship. No

(b) During the past 10 years, have you or your spouse received any compensation from, or been involved in any financial or business transactions with, a foreign government or an entity controlled by a foreign government? If so, please furnish details. No

(c) Have you or your spouse ever registered under the Foreign Agent Registration Act? If so, please furnish details. No

20. Lobbying: Please describe any lobbying activity that you have performed during the past 10 years with respect to legislative or administrative actions at the Federal, State, or local level. None

21. Appearances before Congress: If confirmed, will you be available to appear before this Committee and other Congressional committees to represent agency positions and respond to issues of concern to the Congress? Yes

22. Conflicts of interest:

(a) Have your investments, personal holdings, and other interest been reviewed by yourself and the appropriate ethics counselors within the Federal Government to determine if any of your investments, personal holdings, or other interest could constitute a conflict of interest or create the appearance of such a conflict? Yes

(b) Have you taken appropriate action to avoid any conflict of interest or any appearance of a conflict of interest? Yes

(c) To the best of your knowledge, do any of your investments, personal holdings, or other interests present a conflict of interest or an appearance of a conflict of interest?
No

23. Recusal: The Committee on Energy and Natural Resources requires every Presidential nominee it considers to commit to adhere to the Recusal Policy adopted by the Committee on February 16, 2011 (a copy of which is attached to this Statement). If confirmed, will you adhere to the Committee's recusal policy? Yes

AFFIDAVIT

I, _____, being duly sworn, hereby state that I have read the foregoing Statement for Completion by Presidential Nominees, including all

attachments thereto, and that the information provided therein is , to be best of my knowledge and belief, current, accurate, and complete.

I understand that the Statement and its attachments may be made public.

(Signature of Nominee)

Subscribed and sworn to before me this _____ day of _____ , 201__ .

(Signature of Notary Public)

February 16, 2011

United States Senate
Committee on Energy and Natural Resources
Recusal Policy

Each nominee coming before the Committee on Energy and Natural Resources shall agree to:

- (1) Abide by the recusal requirements imposed by federal conflict of interest laws and the Standards of Ethical Conduct for Employees of the Executive Branch;
- (2) Seek the advice of his or her designated agency ethics officer before proceeding whenever faced with a situation that may give rise to an actual or apparent conflict of interest; and
- (3) Adhere to the principles of ethical conduct and avoid any actions creating the appearance of violating the Standards of Ethical Conduct for Employees of the Executive Branch.



PUBLISHING AGREEMENT ("Agreement") made effective as of April 30, 2015, between Ryan Zinke, whose business address is c/o Ian Kleinert, Objective Entertainment, 345 E. 81st St. #6M, New York, NY 10028; ("Author"), and Thomas Nelson, a division of HarperCollins Christian Publishing, Inc. (a Tennessee corporation) whose business address is PO Box 141000, Nashville, Tennessee 37214-1000 ("Publisher").

WITNESSETH

1. GRANT OF RIGHTS. Author hereby grants, assigns and transfers to Publisher, its successors and assigns, during the term of copyright throughout the world, the following exclusive rights and privileges to and in connection with the literary work, presently entitled *American Commander* ("Work") described as the autobiography of the life of decorated American hero and patriot, Ryan Zinke.

1.1 Subject to the limitations specified herein, the sole and exclusive right to publish, revise, adapt, exploit and/or sell, or license the publication and sale, of all or any portion of the Work or any derivation thereof, in any form, style, or manner, including all media and mediums of expression, reproduction and dissemination, whether known or unknown, without limitation, in any or all languages, throughout the world.

1.2 The sole and exclusive subsidiary publication rights set forth in Section 7 below, granted to Publisher throughout the world. Publisher shall have the right to exercise any or all such subsidiary publication rights itself and/or authorize others to exercise any of the rights granted to Publisher.

2. COPYRIGHT. It is understood and agreed that the copyright shall be registered by Publisher in the name of "Ryan Zinke and Scott McEwen" and Publisher is hereby authorized to take all steps required to secure and/or register such copyright in the United States of America. Publisher agrees to print an appropriate copyright notice in every copy of the published Work and to require all parties to whom it grants licenses in connection with the Work to do the same. The party in whose name the copyright is registered shall hold for the benefit of the other party such rights as the equities hereby created may prescribe. Publisher, where appropriate, will use its best efforts to assign all licensees the responsibility of securing or registering copyrights in the name of the Author outside the United States of America. However, inadvertent failure by said licensees to register said copyright shall not be deemed a breach of this Agreement by Publisher.

2.1 Author is responsible for providing Publisher with any pre-existing copyright information in (or to) the Work within thirty (30) days of signing this Agreement.

2.2 All references to copyright in this Agreement are subject to such amendments and changes as may be enacted by the United States Congress with regard to the present Copyright Act or by the adoption of any new Copyright Act during the term of this Agreement. Upon any such amendment or reenactment of the Copyright Act, this Agreement shall be deemed automatically amended to comply with such law.

ISBN: 9780718077877 / Contract No. 9113-0006

3. MANUSCRIPT. Author agrees to deliver to Publisher not later than January 4, 2016 an e-mailed copy of the manuscript, approximately 60,000-100,000 words in length, and satisfactory in form, style and content and acceptable to Publisher in its sole judgment and discretion and in accordance with all rights granted to Publisher in Section 3.7 herein.

3.1 Manuscript submitted by Author must be in IBM compatible Word format. Author agrees to retain an electronic or hard copy of the manuscript, or a separately-stored digital copy, as protection against loss or destruction of the manuscript furnished to Publisher.

3.2 Time Limit to Publish. If a manuscript that is complete and fully acceptable to Publisher in content and form, including any supplementary matter, is not delivered to Publisher in accordance with the provisions of Section 3 of this Agreement, Publisher shall not be bound by the time limit of publication in Section 10 herein. In the event the manuscript or any such supplementary matter, as the case may be, is not delivered by the due date herein or by a mutually agreed upon written due date extension, Publisher shall have the option to either: (a) continue this Agreement in effect with the right to terminate the Agreement at any future time prior to publication and receive back from Author all monies paid hereunder, or (b) immediately terminate this Agreement and receive back from Author any monies paid hereunder. Editing of any nature which may have begun by Publisher shall not of itself constitute acceptance of the manuscript.

3.3 Third Party Permissions. If copyrighted material from other sources (including any writings, compositions, photos, or materials not owned or controlled by Author) is included in the Work, Author, at Author's own expense, shall obtain from each copyright owner, or his duly authorized representative, written permission for use of such material, and shall deliver to Publisher each such permission at the time of delivery of the final manuscript. Should Publisher determine, at its sole discretion, that any written permissions have not been provided by Author in accordance with this Section, or that additional permissions are needed, Publisher may require Author to obtain missing or needed permissions. Publisher shall have the option of obtaining such written permissions and, in turn, charging any fees demanded by the copyright owner to the Author as a charge against Author's royalty earnings or any portion of the advance that has not yet become due and payable.

3.4 Illustrations. Unless otherwise agreed in writing, Author shall furnish promptly and free of charge to Publisher, complete and ready for reproduction, all drawings, maps, photographs, charts and designs which are a part of or are necessary to the text of the Work. Author, at his expense, shall retain a copy of each item as protection against loss or destruction of the copy furnished to Publisher. If Author fails to supply all necessary drawings, maps, photographs, charts and designs in satisfactory form and within the specified time, Publisher shall have the right to have them made, in which case the charges and expenses of making them shall be deducted from Author's future royalty earnings or any portion of the advance that has not yet become due and payable.

3.5 Index. Publisher may, at its discretion, cause an index to be made of the Work, and the associated charges and expenses shall be deducted from Author's future royalty earnings.

3.6 Corrections. If Publisher is directed by Author to make alterations in any proofs created from final manuscript copy as delivered which shall cost more than ten percent (10%) of the cost of composition of the Work, Author agrees to pay such excess expense, unless the corrections are due to errors made by the typesetter and/or the Publisher. Author shall pay in full for any corrections which he requires or which are necessary for the correction of actual errors after the film has been made in conformity with the last proof as corrected by Author. Publisher shall inform Author of the amount of any excess proof correction charges within six (6) weeks after receipt of the printer's bill. Such

charges and expenses shall be deducted from Author's future royalty earnings or any portion of the advance that has not yet become due and payable.

3.7 Publisher's Determination. Publisher shall be free to prepare and revise the manuscript of the Work in such manner as shall be consonant with its publishing house style. Publisher shall title or re-title the Work, prepare the jacket content and design for the Work, and make such editorial changes in the Work as Publisher deems necessary. All details as to the manner of publication, distribution and advertising, including the format and price of the Work in its manufactured form, and the number and manner of distribution of free copies, shall be left to the sole discretion of Publisher.

3.8 Publisher's Liability. Publisher will use the same care in protecting the manuscript and other material supplied to it hereunder as is its customary practice in protecting similar material in its possession, but it shall not be liable for any damages resulting from the loss or destruction of such materials or any part thereof. Author agrees to retain a duplicate copy of the original manuscript, and all subsequent revisions thereto, in Author's possession at all times prior to publication of the Work. Publisher shall not be liable for any loss or damage related to manuscripts, drawings, recordings or any other property of Author's placed by Author in Publisher's possession and shall not be required to carry insurance of any kind for Author's benefit.

3.9 Prepublication Review / Libel Reading. Publisher shall not be bound by any time limit for publication set forth herein if in Publisher's good faith opinion a manuscript of the Work contains material which is likely to risk involving Publisher in a legal dispute. Author shall pay up to Two Thousand five Hundred Dollars (\$2,500.00) for the legal cost of a libel reading. Failure by Author to make changes advised by Publisher's counsel in good faith shall be cause for termination of this Agreement and shall permit the recovery by Publisher from Author of any monies advanced to Author as provided in Section 3.2. Should Publisher choose to terminate this Agreement, notice of such intent will be in writing and this Agreement will terminate within sixty (60) days from the date of notice. If during the sixty (60) day period the Author cures all legal issues, this Agreement shall remain in full force and effect. The fact that Publisher does or does not conduct a libel reading of the Work shall not relieve Author of any liability relating to Author's representations and warranties in this Agreement.

3.10 Materiality of Provisions. The above provisions as to satisfaction and acceptability of the manuscript to Publisher, time of delivery of the manuscript, and all permissions, licenses, releases and other materials or information required herein or reasonably requested by Publisher, are material terms of this Agreement and upon Author's failure to comply with any such provision, the Publisher may terminate this Agreement, at its option, by written notice to Author. Within thirty (30) days of such written notice of termination, Author shall return to Publisher all amounts previously advanced to him for the Work as provided in Section 3.2. If the manuscript is completed or revisions are made to the manuscript following such termination, Author shall nevertheless be obligated to offer the same to Publisher, which shall have the option and right to publish the completed/revised manuscript under the terms of this Agreement. The obligation of Author to submit a subsequently completed or revised manuscript to Publisher shall remain in effect even if the other provisions of this Agreement are terminated.

3.11 Writer. If Publisher and Author deem it necessary to hire a writer to assist Author in the preparation of the manuscript, Publisher shall hire an individual with a work-for-hire agreement and shall pay any fees that may become due and owing under such agreement as a deduction from Author's advance against royalties. Should Author work with a writer on his own determination, Author shall be responsible for any payments to and agreements with said writer.

4. **ADVANCE.** Author shall collaborate with Scott McEwen in the preparation and delivery of the manuscript and Author hereby acknowledges and agrees that Publisher shall pay to Scott McEwen ("Co-Author"), under separate agreement, the sum of Two Hundred Fifty Thousand Dollars (\$250,000.00) less agent's commission, as an advance against all monies accruing to Author under the terms of the Agreement. Author hereby agrees that the advance paid to Scott McEwen shall be recouped by Publisher before any royalty earnings are payable to Author as stated in section 5 herein.

5. **ROYALTIES.** Publisher shall pay to Author the following royalties on the copies of the Work sold.

Publisher agrees that all royalties due to the Author under this Agreement will be payable as follows: one hundred percent (100%) to Author until the monies actually paid to the Author total \$250,000.00, following the recoupment of the \$250,000.00 advance payments made to Scott McEwen; and, once the monies actually paid to the Author reach \$250,000.00, thereafter all royalties due to Author under this Agreement will be payable as follows: fifty percent (50%) to Author, and fifty percent (50%) to Scott McEwen.

5.1 **Trade Sales.** Publisher shall pay to Author the following royalties on the Suggested Retail Price for sales of the Work. "Suggested Retail Price" means the price shown on Publisher's invoices from which discounts are deducted to calculate the amounts payable to Publisher. On all copies of each edition of the Work other than sales falling within Sections 5.2 through 5.17 below, the royalty shall be as follows:

Hard Cover: Ten percent (10%) of the Suggested Retail Price of the Work on the first five thousand (1-5,000) copies sold; twelve and one-half percent (12.5%) of the Suggested Retail Price actually sold by Publisher of the Work on the next ten thousand (5,001-15,000) copies sold; and fifteen percent (15%) of the Suggested Retail Price actually sold by Publisher of all copies thereafter (15,001+).

Trade Paper: Thirteen percent (13%) of the Suggested Retail Price of the Work actually sold by Publisher of all copies.

Sales falling within Sections 5.2 through 5.17 below will not count toward any graduated royalty specified in Section 5.1 above.

5.2 **Mass Market Paperback Editions.** On copies of any mass market paperback edition (defined as any paperbound edition having a trim size of approximately 4 3/16" by 7") of the Work sold by Publisher, the royalty shall be ten percent (10%) of the Suggested Retail Price of the Work. The royalty payable to Author with respect to a mass market paperback edition of the Work sold or distributed by any licensee of Publisher shall be governed by Section 7 of this Agreement.

5.3 **Large-Print Editions.** On copies of regular large-print hardcover edition of the Work published and sold by Publisher in the United States of America, the royalty shall be ten percent (10%) of the Suggested Retail Price of the Work. On copies of regular large-print paperback edition of the Work published and sold by Publisher in the United States of America, the royalty shall be seven and one-half percent (7.5%) of the Suggested Retail Price of the Work.

Publisher shall pay to Author the following royalties on the net sales of the Work. As used herein, "net sales" shall mean gross revenue from all copies of the Work sold less any invoiced credit for discounts, returns or adjustments.

5.4 Export. When copies of English-language versions are sold for export the royalty shall be ten percent (10%) of the sums actually received by Publisher on net sales.

5.5 Special Discount. When copies are sold in quantities sufficient, in Publisher's judgment, to justify special discounts of sixty-five percent (65%) or greater of Publisher's suggested retail price, the royalty shall be one half (1/2) the otherwise prevailing royalty rate of the sums actually received by Publisher on net sales.

5.6 Discount Store Editions. On copies of the Work sold to discount stores, such as Dollar General, Dollar Tree, Family Dollar or Fred's as a custom low-cost edition, the royalty shall be a sum equal to five percent (5%) of the sums actually received by Publisher on net sales.

5.7 Foreign Language Editions. On all editions of the Work published in a foreign language by an affiliate or subsidiary of Thomas Nelson, whether distributed domestically or in a foreign country, and excluding sales covered by other provisions of Section 5 of this Agreement, the royalty shall be eight percent (8%) of the sums actually received by the subsidiary or affiliate on net sales. The royalty payable to Author with respect to these editions of the Work sold or distributed by any other licensee of Publisher shall be governed by Section 7 of this Agreement.

5.8 Book Clubs. On copies of the Work sold through book clubs or similar book sales organizations owned by Publisher, the royalty shall be eight percent (8%) of the sums actually received by Publisher on net sales. The royalty payable to Author on copies of the Work sold with respect to Publisher's sale or license to book clubs shall be governed by Section 7 of this Agreement.

5.9 Direct/Premium Sales. For all copies sold by Publisher or any other division or subsidiary of HarperCollins Christian Publishing, Inc. directly to consumers or other customers such as churches in response to direct promotions such as mail order catalogs or campaigns, telephone sales, and e-commerce sites:

5.9.1 For all physical copies sold by Thomas Nelson or any other subsidiary or division of HarperCollins Christian Publishing, Inc. directly to consumers or other customers such as churches through its own e-commerce sites: the royalty rate would be the same trade rates as those set out in 5.1-5.3, above for sales of the applicable edition.

5.9.2 For all physical copies sold by Thomas Nelson or any other subsidiary or division of HarperCollins Christian Publishing, Inc. directly to consumers or other customers such as churches in response to direct mail promotions such as mail order catalogs or campaigns, and telephone sales, the following percentages of Amounts Received: 5%.

5.10 Free Copies. No royalties shall be paid on copies furnished at no charge to Author or distributed for review, advertising, sample, promotional, or like purposes.

5.11 Excerpts/Permissions. Author grants sole and exclusive rights to Publisher to grant permission to publish excerpts from the Work, whether or not a fee shall be collected for such use. Publisher warrants that it will make no gratuitous grants of permissions, except as shall, in its sole judgment or discretion, advance the sale of the Work or enhance the public esteem of Author. Publisher shall pay to Author fifty percent (50%) of all sums of money received as compensation for such grants of permission to reprint excerpts from the Work.

5.12 Braille/Handicapped Editions. Publisher is authorized to permit publication of the Work in Braille, or reproduction of the Work for the physically handicapped without payment of fees and

without compensation to Author, providing no compensation is received by Publisher. If compensation for any such use is received, Publisher shall pay Author fifty percent (50%) of the net proceeds.

5.13 Audio/Video/Curriculum. Publisher, at its sole discretion, shall have the right to publish a recorded audio version, video abridgement and/or curriculum of the Work. All applicable provisions of this Agreement shall apply to the publication of audio/video works. For all copies sold through regular trade marketing channels, the royalty shall be ten percent (10%) of the sums actually received by Publisher on net sales. For all copies rented through regular marketing channels, the royalty shall be ten percent (10%) of the sums actually received by Publisher on net sales. The royalty payable to Author with respect to audio/video/curriculum rights of the Work sold or distributed by any licensee of Publisher shall be governed by Section 7 of this Agreement.

5.14 Electronic Editions. On copies of any electronic edition of the Work sold by Publisher or an affiliate or subsidiary, the royalty shall be:

5.14.1 eBooks without enhancements: twenty-five percent (25%) of the sums actually received by Publisher on net sales.

5.14.2 All electronic digital products excluding those set forth in Section 5.13.1, including but not limited to, enhanced eBooks, CD-ROMs, apps, audio/video streaming and downloads: ten percent (10%) of the sums actually received by Publisher on net sales, or a pro-rata portion thereof if less than the entire Work is used (e.g. part of a compilation).

5.15 Workbooks and Study Guides. On copies of any workbook or study guide based on the Work for publication and sale by Publisher, the royalty shall be ten percent (10%) of the sums actually received by Publisher on net sales. The royalty payable to Author with respect to workbook or study guide rights sold or distributed by any licensee of Publisher shall be governed by Section 7.10 of this Agreement.

5.16 Book Sets. On copies of multiple books by Author published together and sold as multiple books-in-one for publication and sale by Publisher, the royalty shall be eight percent (8%) of the sums actually received by Publisher on net sales. The royalty payable to Author with respect to such sets sold or distributed by any licensee of Publisher shall be governed by Section 7.6 of this Agreement.

5.17 Ancillary and Derivative Products. For any publication or product derived from the Work that is published or produced and sold by Publisher, for which a royalty rate is not specified elsewhere in this Agreement, the royalty shall be that rate which Publisher acting in good faith, it is then paying or would pay, with respect to comparable products or publications.

6. REMAINDERS; OVERSTOCK. Publisher may, without prior notice to Author, dispose of books which, in its sole discretion, it deems to be overstock or remainders in any manner it may see fit and will have no obligation to pay royalties on copies so disposed of at discounts equal to or greater than seventy-five percent (75%). Publisher will use its best efforts to notify Author of any remainder/overstock sales and shall offer the books to Author at said remainder/overstock prices. However, inadvertent failure to notify author of said sale shall not be a breach of this Agreement.

7. EXPLOITATION OF SUBSIDIARY RIGHTS. Additional subsidiary and other rights granted to Publisher in this Agreement are defined below. All monies actually received by Publisher from licensing or disposition of these rights, less agent's commissions when applicable, as shall be incurred by Publisher in disposing of such rights, shall be shared equally, fifty percent (50%) each to Author and Publisher. Upon Publisher's recoupment of the advance (\$250,000.00 paid to Scott McEwen) and Author's actual receipt of \$250,000.00 in royalty payments, thereafter, the monies received by Publisher from licensing

shall be shared twenty-five percent (25%) each to Author and Scott McEwen and fifty percent (50%) to Publisher.

- 7.1 Abridgment or condensation
- 7.2 Anthology or quotation
- 7.3 Book clubs or similar organizations
- 7.4 Reprints, paperbacks or hardcover
- 7.5 Translations
- 7.6 Special editions
- 7.7 First serial
- 7.8 Second serial and syndication (including reproduction in compilations, magazines, newspapers or books)
- 7.9 Calendars
- 7.10 Workbook, Study Guides
- 7.11 Sole and exclusive rights of publication in, and disposal of rights in foreign countries
- 7.12 These following additional rights:
 - 7.12.1 *Dramatic Intentionally excluded*
 - 7.12.2 *Audio/Film/Video/Multimedia Film Intentionally excluded*
 - 7.12.3 Merchandising and other commercial rights
 - 7.12.4 CD-ROM, hardware, computer software, programming, and related computer rights
 - 7.12.5 Electronic Editions (eBooks, apps, internet, audio/video streaming, downloads, etc.)

7.13 All rights not specifically enumerated, whether now in existence or hereinafter coming into existence.

7.14 All such rights may be disposed of by sale, lease, license or otherwise by Publisher who for such purpose is hereby appointed the attorney-in-fact of Author, and the power granted to Publisher hereunder shall be irrevocable during the term hereof. Author agrees to sign, make, execute, deliver and acknowledge all such papers, documents and agreements as may be necessary to effectuate the grants hereinabove contemplated. In the event Author shall fail to do so, such documents may be signed, executed, delivered and acknowledged by Publisher as the attorney-in-fact of Author with the same full force and effect as if signed by Author.

8. **RECOVERABLE PAYMENTS.** All advances made by Publisher to or for the benefit of Author and any sums chargeable to or payable by Author pursuant to this Agreement, together with any other sums due to Publisher from Author under this Agreement, may be charged against and recovered from any and all monies accruing to Author under this Agreement.

9. **OPTION.** Author grants to Publisher the option to accept for publication the next full book-length work written by Author, either individually or in conjunction with other writers, on mutually agreed terms to be determined by the parties. Such work shall be submitted to Publisher along with a letter and detailed synopsis or complete manuscript (at Publisher's discretion). Publisher shall have ninety (90) days following receipt thereof to exercise its option by written notice to Author.

10. **TERMINATION.** In the event Publisher shall fail, for any reason, to publish the Work within eighteen (18) months after Publisher's acceptance of the final revised manuscript (except on account of strikes, fires, acts of God, or other contingencies beyond the control of Publisher or its suppliers, or advisability of postponement because of prospective trade conditions), Author shall have the right, upon sixty (60) days' written notice to Publisher, to terminate this Agreement and to retain any and all sums theretofore received from Publisher as an advance or compensation for the rights granted herein. Notwithstanding the foregoing, should Publisher commence preparation for publication of the Work

within said sixty (60) day period, Author's notice of termination shall have no effect, and this Agreement shall remain in full force and effect as if no notice had been given. The right to request termination and retention of sums paid as provided in this Section shall be Author's sole and exclusive remedy for Publisher's failure to publish the Work pursuant to this Agreement. Consequential damages are hereby expressly excluded; thus, Author shall not be entitled to recover consequential damages (including, but not limited to lost profits for Publisher's failure to publish).

10.1 Moral Turpitude. In the event Author is publicly accused of: (a) an act of moral turpitude (substantiated in Publisher's reasonable discretion by material evidence, a court decision, or Author's own admission); (b) the violation of any law; (c) any other conduct by Author which subjects or could be reasonably anticipated to subject Author or Publisher to public ridicule, contempt, scorn, hatred or censure; or (d) conduct that could, in Publisher's sole discretion, materially diminish potential sales of the Work; then, Publisher shall have the right to terminate this Agreement upon sixty (60) days written notice to Author outlining any such act or accusation. In the event Publisher terminates this Agreement for Moral Turpitude pursuant to this Section, Author will pay to Publisher a sum equal to the advances paid to Author prior to said termination which have not been recouped by Publisher as of the date of such termination, and shall repay to Publisher all of Publisher's documented and incurred expenses for production, advertising and publicity directly related to the Work. Author will make such payment within ninety (90) days following Author's receipt of an accounting statement from Publisher. Upon Publisher's receipt of such payment, all rights granted to Publisher in the Work, with the exception of subsidiary rights licensed or sold to a third party and in effect at such time, shall terminate and vest exclusively in Author, provided that Publisher shall have the right to sell or otherwise dispose of all remaining copies of the Work published by Publisher under this Agreement in any manner Publisher shall deem appropriate.

10.2 Determination Not to Publish. Prior to publication Publisher may, in its sole discretion, cancel publication of the Work. If Publisher decides not to publish, this Agreement will terminate and all rights will vest with Author who shall retain all advances paid by Publisher for the Work prior to the date of termination as a "kill fee".

11. AUTHOR'S WARRANTY. Author warrants, covenants and represents to Publisher that: (a) in performing the obligations under this Agreement, Author will comply with all applicable laws and regulations, including anti-bribery and other anti-corruption laws; (b) the Work is original; (c) Author is the sole author and proprietor thereof and has full power to enter into this Agreement; (d) Author is conveying his rights in the Works to Publisher free and clear of any and all liens and encumbrances; (e) the Work has not heretofore been published in any form and Author has not entered into or become subject to any contract, agreement or understanding with respect thereto other than this Agreement; (f) the Work will not infringe upon any proprietary right at common law, or any statutory copyright or any other right whatsoever; (g) to the best of Author's knowledge, all facts and representations included and/or depicted in the Work are true and accurate, and (h) the Work is innocent and contains no matter whatsoever that is obscene, defamatory, in violation of any right of privacy or otherwise in contravention of law. Author shall indemnify and hold Publisher harmless against any damage or judgment, including court costs and attorneys' fees, which may be sustained or recovered against Publisher resulting from any breach or violation by Author of any warranties contained herein.

Author shall also reimburse Publisher for all expenses including court costs, attorneys' fees and amounts paid in settlement sustained by Publisher in resisting any claim, demand, suit, action or proceeding asserted or instituted against Publisher arising out of Author's alleged breach or violation of any warranties contained herein. Publisher shall have the right, upon the assertion of any claim or demand or the commencement of any action or proceeding the basis of which, if sustained, would constitute a breach of the Author's representations and warranties contained herein, to withhold any payments of royalties or

other earnings to Author hereunder in an amount reasonably necessary in Publisher's good faith judgment to pay the cost of defending such claims and to satisfy any liability arising therefrom. Such monies will be applied in satisfaction of Author's indemnity hereunder and the excess, if any, will be remitted to Author after Publisher has been fully indemnified. The warranties contained in this Agreement shall survive its termination and extend to licensees, distributors, printers and assigns. Author undertakes for himself and his heirs and assigns to execute at any time on the request of Publisher any document or documents to confirm or continue any of the rights defined herein.

11.1 **Plaintiff Action.** Author hereby grants to Publisher the right, if copyright is in Author's name, to bring in the name of Author, as plaintiff or complainant, any action or proceeding for the enjoining of an infringement of the copyright in said Work and for any other remedies provided by law, including damages resulting therefrom, and the net amount recovered after deducting all expenses of suit shall be divided equally between Author and Publisher.

11.2 **Competing Works.** Author agrees to cause the Work to be Author's next publication in book form, and further agrees he will not undertake without the written consent of Publisher, to write, print, publish, produce, or cause to be written, printed, published, or produced, (alone, in conjunction with others or through any other arrangement) anything for publication in book form before the Work has been published. Author will not, without written consent of Publisher, write, print, publish or produce, or cause to be written, printed, published or produced, during the continuance of this Agreement, any other edition of said Work, any work derived from the Work, or any other work in any form tending to compete or interfere with or injure the sale of the Work in any manner.

11.3 **Author's Name and Likeness.** In connection with the publication, advertising and marketing of the Work, Publisher shall, without restriction, have the right to use and allow others to use Author's name, pre-approved likeness, and biographical materials concerning Author, and permit others to publish such promotional materials, if, in the judgment of Publisher, such use will help promote the sale of the Work.

11.4 **Promotion.** Author agrees to be available for promotion of the Work in accordance with Publisher's marketing and publicity plans.

12. **WITHDRAWAL OF WORK.** In the event that Publisher has determined not to make the Work available in any format and publicly declares the Work to be out of print, Author may, within thirty (30) days of payment of all sums due to Publisher for Author purchases, submit to Publisher a written request to reacquire all rights previously granted to Publisher under this Agreement; subject, however, to any sublicenses or options previously granted by Publisher to other parties and to Publisher's right to receive future payment due to Publisher with respect to such sublicenses and options. In the event Author desires to acquire any negatives of the Work (with the exception of jacket or cover negatives), if such have been preserved, along with any negatives of illustrations furnished by Author and any remaining copies of the Work, Author shall have sixty (60) days following actual reversion of rights in which to submit a written request for same. The requested materials shall be transferred to Author, provided that Author shall pay to Publisher the shipping costs and original manufacturing costs of such negatives, including film expenses. Should Author decline to purchase said materials, or fail to submit a written request for same within the sixty (60) day period, Publisher shall have the right to destroy any negatives and to sell remaining copies of the Work at cost or less, without payment of royalty to Author for such copies.

13. **BANKRUPTCY.** If a petition in bankruptcy (as distinguished from reorganization or arrangement) shall be filed by Publisher or shall be filed against Publisher and finally sustained, Author shall have the right within a reasonable time following the filing of a voluntary petition or the final sustaining of an involuntary petition, to acquire the rights granted hereunder at their fair market value (to be determined by agreement), together with any remaining copies at their fair market value (to be determined by agreement), and thereupon this Agreement shall terminate. However, no reversion of rights under this clause shall take place until after Author has repaid to Publisher any unearned advances or the indebtedness incurred by him and still outstanding under this Agreement.

14. STATEMENTS; PAYMENTS AND EXAMINATION OF RECORDS. Publisher agrees to render statements of account to Author on or about forty-five (45) days after the royalty periods ending March 31, June 30, September 30, December 31 of each year, and to pay to Author any sums due as reflected on said statements. If Publisher elects to change its accounting periods, the statements and payments due Author shall be rendered within forty-five (45) days following the end of such new accounting periods. In rendering accounts and payments to Author, Publisher shall have the right to allow for a reasonable reserve against returns and nonpayment of invoices for copies billed by Publisher. If in any quarterly accounting period the total payment due is less than ten dollars (\$10.00), Publisher may defer the rendering of such statement and payment until such time as the sum of ten dollars (\$10.00) or more shall be due. All royalty statements and other accounts rendered by Publisher shall be binding upon Author and not be subject to any objection for any reason unless such objection is made in writing, stating the basis thereof, and delivered to Publisher within two (2) years from the date of such statement or account.

Author, upon giving Publisher thirty (30) days prior written notice, shall have the right to examine or cause to be examined through certified public accountants the books of account of Publisher insofar as such books of account shall relate to the sales of the Work. Such examination must take place at Publisher's regular place of business and during Publisher's regular working hours. Such audit may not be conducted more frequently than once during each calendar year and no audit may be conducted for any accounting period more than once. All costs of any audit conducted by Author shall be borne solely by Author.

15. AUTHOR'S COPIES. Publisher agrees to present to Author one-hundred (100) and to Agent fifteen (15) free copies of the first edition of each Work upon publication (for personal use only) and to permit Author, subject to credit approval, to purchase additional copies for his own personal use at the following discounts off Publisher's suggested retail price, plus any applicable sales tax:

- 1-499 copies at sixty-five percent (65%); and
- 500 or more copies at seventy percent (70%).

Notwithstanding the discounts listed above, in no case shall the amount Author pays per copy be less than Publisher's actual cost of production. Author shall be billed directly for these copies (plus shipping charges) and shall make payment within thirty (30) days of the invoice date. No consignment sales shall be made to Author. Author shall not receive royalties on any sales to Author, and such sales shall be non-returnable. Above quantities are to be sold at the nearest case lot quantity.

Publisher understands that Authors will at some point sell product through their personal website. However, Author agrees that Author shall not himself, nor affirmatively permit third parties to, engage in any broad-based advertising intended to draw, or resulting in the drawing of, book customers through to Author's website(s) instead of Publisher's retail sales channels, nor shall Author intentionally engage in competition with Publisher's retail sales channels.

After the initial publication of the Work, Publisher agrees to present Author with five (5) free copies of each subsidiary, ancillary or derivative edition of the Work that is published.

16. BENEFIT ASSIGNMENT. This Agreement shall be binding upon and shall inure to the benefit of the parties hereto and to their respective successors, assigns, executors, administrators and/or personal representatives. Publisher may assign this Agreement and assign, license or otherwise transfer any or all of Publisher's rights, privileges and property under this Agreement. Author may assign monies due to him under this Agreement, provided that no assignment by Author of any such monies or valuable consideration shall be valid as to Publisher unless Publisher has received written notice thereof from

Author and has consented to such assignment in writing. Author may not assign this Agreement, nor transfer or delegate the performance of any of Author's duties and obligations under this Agreement.

17. NOTICES. Any written notice, except for statements or payments required under any of the provisions of this Agreement, shall be deemed properly served by delivery in person; or via certified or registered mail to a party at the address set forth above, except as the address may be changed by notice in writing. All notices shall be deemed given on the date of personal delivery or upon the date such notice bearing proper address and sufficient postage for certified or registered mail is deposited in the United States mail or authorized foreign governmental mail system.

18. WAIVER. A waiver of any breach of this Agreement or of the terms or conditions by either party thereto shall not be deemed a waiver of any repetition of such breach or in any manner affect any other terms or conditions hereof. No waiver shall be valid or binding unless it shall be in writing and signed by the parties.

19. MEDIATION. If a dispute arises out of, or relating to, this Agreement or the breach hereof, and if said dispute cannot be resolved through negotiation between the parties, the parties shall first attempt to resolve the dispute in good faith through mediation in Nashville, Tennessee, with the appointment of an independent neutral mediator acceptable to both parties. Such mediation shall be demanded by written notice. If the parties cannot agree on a mediator within fifteen (15) days of such notice, each party shall select a mediator and the two mediators shall jointly select a third mediator, which third mediator shall serve as the sole mediator. The mediation shall take place within thirty (30) days of selection of the mediator(s). The commercial mediation rules of the American Arbitration Association will control the terms of any such mediation. The parties shall share the cost of the mediation equally. In the event the mediation fails to result in a settlement of the dispute, either party shall then be free to seek whatever additional action, including remedies through the courts, it deems appropriate.

20. GOVERNING LAW / JURISDICTION. This Agreement has been entered into in the state of Tennessee and shall be construed in accordance with the laws of said state. The parties agree that all disputes and matters whatsoever arising under, in connection with or incident to this Agreement shall be litigated, if at all, in and before a court located in Nashville, Davidson County, Tennessee to the exclusion of any other county and state.

21. TERMINOLOGY. Whenever required by the context of this Agreement, the singular shall include the plural, the plural the singular, and the masculine the feminine and/or neuter. "Author" shall include "Authors" if there is more than one.

22. CAPTIONS. Captions contained herein are for convenience only and shall not be deemed part of the Agreement.

23. DEADLINE FOR SIGNING. If this Publishing Agreement is not executed by Author and returned to Publisher within thirty (30) days of the date of Publisher's submission of this Agreement to Author, Publisher may, in its sole discretion, declare this Agreement null and void. The date of submission to Author shall be determined in accordance with Section 17 above, or by email confirmation of receipt.

24. SEVERABILITY. The validity of any provision or any part of a provision of this Agreement shall not affect the validity of the remaining provisions. In the event any part of this Agreement is declared void or unenforceable by a court of competent jurisdiction and/or any government agency, the remainder of the Agreement shall continue in full force and effect.

25. CONFIDENTIALITY. Other than as may be required by applicable law, government regulation or order, or by order or decree of any court of competent jurisdiction, Author shall not publicly divulge, announce, or disclose in a press release or any other manner to any third party, information or matters revealed to Author pursuant hereto, or any of the specific terms or conditions (including but not limited to royalty rates, advances, and net sales) of this Agreement. Author may publicly divulge information about the terms of the Agreement only if such information is approved in advance by Publisher.


26. ENTIRE AGREEMENT. This Agreement constitutes the entire binding agreement and understanding of the parties with respect to the subject matter hereof and may be modified, amended or discharged only by a written instrument signed by the party or a duly authorized officer or agent of the party against whom such modification, amendment or discharge is asserted.

27. AGENT. The Author hereby irrevocably and in perpetuity appoints Objective Entertainment, 345 East 81st Street, #6M, New York, NY 10028 Attn: Ian Klehnert as his sole and exclusive agent with respect to the Work and authorizes and directs the Publisher to make all payments due and/or to become due to the Author to and in the name of the said agent and to accept the receipt of the said agent as a good and valid discharge of all such indebtedness. As the sole and exclusive agent, the said agent is hereby empowered by the Author to act on his behalf in all matters arising from and pertaining to this Agreement. For services rendered and to be rendered, the Author does hereby irrevocably and in perpetuity assign and transfer to the said agent, and the said agent is entitled to receive and retain, as their commission, as an agency coupled with an interest, a sum equal to fifteen percent (15%) of the gross monies accruing to the account of the Author hereunder, before any deductions from and charges against such monies for any reason whatsoever are made. The provisions of this paragraph shall survive the expiration and/or termination of this Agreement.

SIGNATURES ON NEXT PAGE

IN WITNESS WHEREOF, the parties hereto have hereunto affixed their respective hands the day and year here upon written.

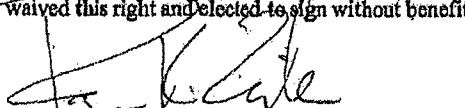
FOR THOMAS NELSON:


Matt Baugher
Senior Vice President & Publisher

9/27/15
Date

FOR AUTHOR:

By signing below, Author warrants that he has been advised by Publisher that he has the right to seek review of this Agreement by legal counsel of his own choosing and that he has either done so, or has waived this right and elected to sign without benefit of legal counsel.


Ryan Zinke

25 Sept 2015
Date

US
Author's citizenship

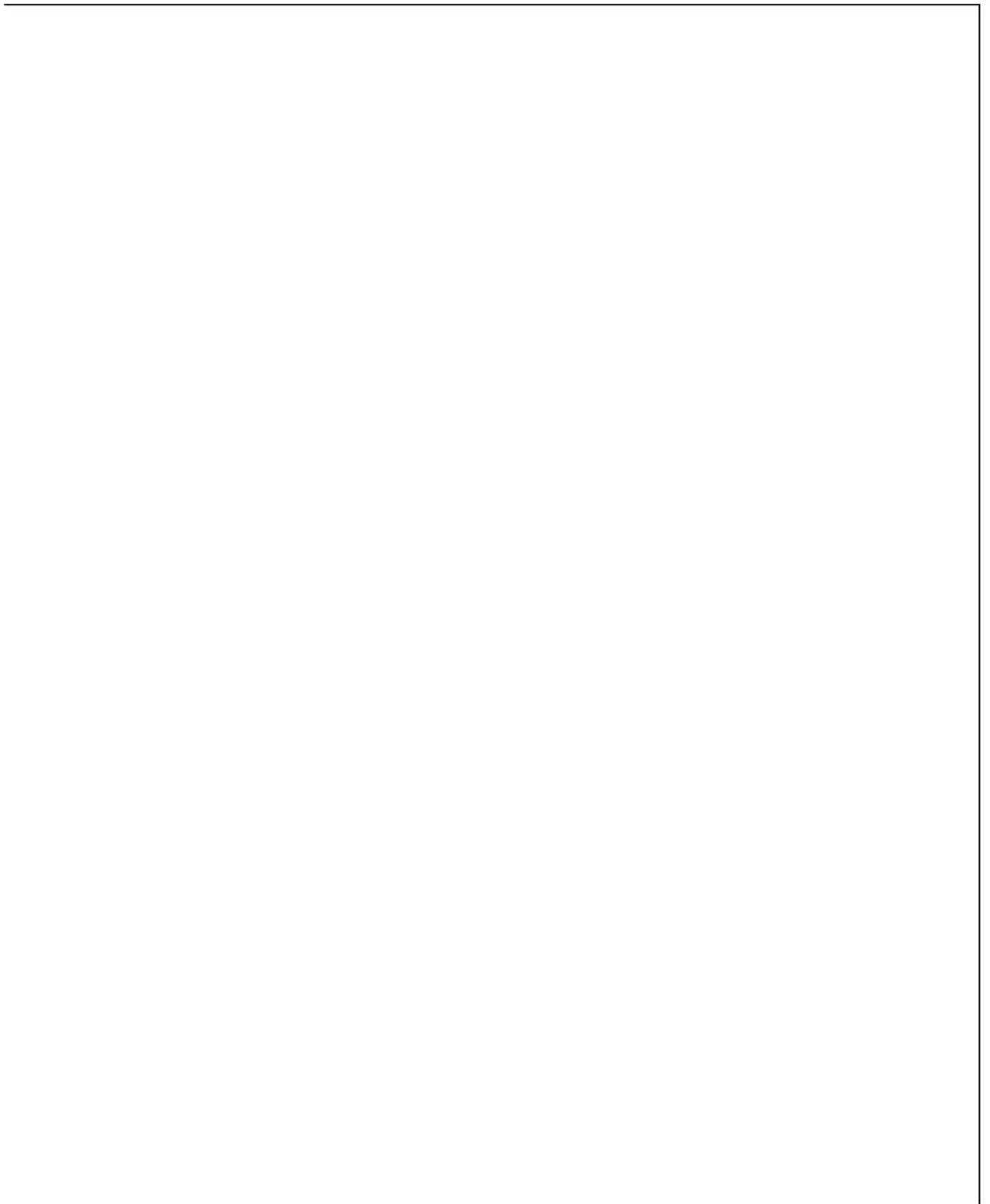
11/1/61
Author's Date of Birth

516 589669
Author's SSN or Tax ID Number

Ryan Zinke
Nominee OGE Form 278e

Ryan Zinke
Nominee OGE Form 278e







United States Department of the Interior

OFFICE OF THE SOLICITOR
Washington, D.C. 20240

IN REPLY REFER TO:

January 10, 2017

Honorable Walter M. Shaub, Jr.
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington, D.C. 20005-3917

Dear Mr. Shaub:

I have reviewed the Public Financial Disclosure Report (OGE Form 278e), dated December 18, 2016, submitted by Mr. Ryan Zinke, in connection with President-Elect Trump's intent to nominate Mr. Zinke to serve as Secretary of the Department of the Interior.

Also, enclosed is a letter from Mr. Zinke that specifies certain actions that he will take in connection with ethics matters if confirmed as Secretary.

Based on my review of Mr. Zinke's OGE Form 278e and the enclosed letter, it is my opinion that the report is complete and discloses no conflicts of interest under applicable laws and regulations.

If you have any questions concerning this matter, please contact me at (202) 208-7960.

Sincerely,

Melinda J. Loftin
Designated Agency Ethics Official
Director, Ethics Office

Enclosure
As stated

Charles W. Dent, Pennsylvania
Chairman
Linda T. Sánchez, California
Ranking Member

Patrick Meehan, Pennsylvania
Trey Gowdy, South Carolina
Susan W. Brooks, Indiana
Kenny Marchant, Texas

Michael E. Capuano, Massachusetts
Yvette D. Clarke, New York
Ted Deutch, Florida
John B. Larson, Connecticut



ONE HUNDRED FOURTEENTH CONGRESS

U.S. House of Representatives

COMMITTEE ON ETHICS

Thomas A. Rust
Staff Director and Chief Counsel

Joanne White
Administrative Staff Director

Clifford C. Stoddard, Jr.
Counsel to the Chairman

Daniel J. Taylor
Counsel to the Ranking Member

1015 Longworth House Office Building
Washington, D.C. 20515-6328
Telephone: (202) 225-7103
Facsimile: (202) 225-7392

August 10, 2015

The Honorable Ryan Zinke
U.S. House of Representatives
113 Cannon House Office Building
Washington, DC 20515

Dear Colleague:

This responds to your letter, received by the Committee on July 6, 2015, seeking Committee review and approval of a draft contract to publish a book. Subject to the guidance contained in this letter, we approve your proposed contract.

FACTUAL BACKGROUND

According to your letter and accompanying proposed contract, the letter from the publisher, additional information provided to Committee counsel, and publicly-available information, the background on this matter is as follows. You plan to publish a non-fiction work tentatively titled *American Commander*, which will be your autobiography. It will describe your life as a decorated American hero and patriot.

The contract concerns the publication of your work by Thomas Nelson (Thomas Nelson), a division of HarperCollins Christian Publishing, Inc. (HarperCollins Christian). Thomas Nelson was established in Edinburgh, Scotland, in 1798, and was purchased by HarperCollins Publishers in 2011. According to its Web site, Thomas Nelson prints a large variety of bibles, bible study, and reference materials, as well as fiction, non-fiction, and children's titles.¹ It has published biographical and autobiographical works by Rick Santorum, Denise Jackson, and Deion Sanders, among many others.

Paragraph 5 of the publishing contract calls for you to receive royalty payments on copies of the book sold. The royalty rate for sales of hardcover copies in the United States is 10% of the suggested retail price for the first 5,000 copies; 12.5% of the suggested retail price for the next 10,000 copies; and 15% of the suggested retail price for all copies thereafter. For sales of paperback editions, the royalty rate is 13% of the suggested retail price for trade paperback editions and 10% of the suggested retail price for mass market paperback editions. The contract

¹ <http://www.thomasnelson.com>

also provides that you will receive 25% of the net sales receipts for e-books and 10% of the net sales receipts for other electronic formats. You are entitled to lesser royalty rates for special formats, such as large-print editions and foreign language editions, and for discounted books. The contract does not entitle you to any advanced royalties. Paragraph 15 states that you will receive 100 free copies and your agent, Ian Kleinert of Objective Entertainment (Agent), will receive 15 free copies. You may also purchase additional copies at a considerable discount. Paragraph 5.10 states you will not receive any royalties on the free copies, and paragraph 15 states that you will not receive any royalties on any discounted copies you purchase.

Paragraph 5 calls for payment of \$250,000 by Thomas Nelson to Scott McEwen, your “collaborator,” as an advance on royalties. Paragraphs 4 and 27 state that Mr. McEwen’s advance will be less a 15% commission owed to your Agent. Paragraph 5 further states that once Thomas Nelson has recouped the advance royalties paid to Mr. McEwen, royalties will be paid solely to you until you have received \$250,000 in royalty payments. After you and Mr. McEwen have each received \$250,000 in royalties, Thomas Nelson will split royalty payments between you and Mr. McEwen equally. Your attorney, Vincent DeVito, confirmed that neither Mr. McEwen nor your Agent, nor any of their respective relatives, are House Members, officers, or employees.

Finally, you provided a letter from Dan Foutz, Senior Business Affairs Counsel, at HarperCollins Christian. Mr. Foutz’s letter confirms that the publishing contract “adheres to traditional standards and practices within the publishing industry” and does not contain terms that are materially different from HarperCollins Christian’s contracts for other similar non-fiction works. Mr. Foutz’s letter also states that the royalty provisions in the publishing contract are “usual and customary.”

LEGAL BACKGROUND AND ANALYSIS

Publishing Contract

House Members are limited in the type and amount of income they may earn in employment outside of the House.² However, copyright royalties received pursuant to a publishing contract that has been approved in advance by the Committee are not subject to the annual limitation on Members’ outside earned income.³ The Committee will only approve contracts with an “established publisher” and that contain “usual and customary contractual terms.”⁴ Even under an approved publishing contract, a Member may not receive any advance payment on copyright royalties.⁵ A literary agent, researcher, or other individual employed by the Member may receive an advance on copyright royalties directly from the publisher, provided

² See Ethics in Government Act (EIGA), 5 U.S.C. app. §§ 501-503; House Rule 25, cl. 1(a)(1).

³ House Rule 25, cl. 4(d)(1)(E).

⁴ *Id.*, at cl. 3(b).

⁵ *Id.*, at cl. 3(a).

the individual is not a House employee or a relative of any House Member, and the royalties are solely for the benefit of that individual.⁶

Based on the representations to the Committee made by you, Mr. DeVito, the publisher, and publicly-available information, your proposed book publishing contract appears to be consistent with the provisions summarized above. Specifically, Thomas Nelson appears to be an “established publisher” as that term is used in the rule, and royalties will be paid in accordance with usual and customary contractual terms. Further, you will receive no advance on royalties under the contract. Finally, neither your Agent, nor your collaborator, nor any of their respective family members are Members or employees of the House. Accordingly, the Committee approved the proposed contract.

Activities Related to Writing and Publishing Books

Although the subject matter of your book may focus on topics you address in your official capacity, writing and publishing a book is personal activity and not official House business. Government funds may be used only for the purposes appropriated.⁷ Regulations of the Committee on House Administration further emphasize that official resources are to be used only for official business.⁸ Pursuant to these provisions, you may not use any House resources – including your official House photo, office supplies or equipment, and staff while on official time – in connection with the writing, publication, or sale of your book. Additionally, non-public information or materials acquired during the conduct of your House business, including official notes, files, or other research, is not permissible source material for a book. Finally, you should not imply official endorsement of the book by the House.⁹ Accordingly, you are permitted to identify yourself as a “Member of Congress,” “Congressman,” or “Representative.”

Financial Disclosure Reporting Requirements

As a Member, you must disclose royalties that exceed \$200 in any calendar year on Schedule A (“Assets and Unearned Income”) of your annual financial disclosure statement required by the EIGA.¹⁰

LIMITATIONS

The response above constitutes an advisory opinion concerning the application of House Rules 23 and 25; the EIGA; and 31 U.S.C. § 1301. The following limitations apply to this opinion:

⁶ *Id.*

⁷ 31 U.S.C. § 1301(a).

⁸ See generally Comm. on House Admin, *Members’ Congressional Handbook*.

⁹ See House Rule 23, cls. 3 and 11.

¹⁰ See 5 U.S.C. app. § 102(a)(1)(B), (a)(3).

- This advisory opinion is issued only to Representative Ryan Zinke, the requestor of this opinion. This advisory opinion cannot be relied upon by any other individual or entity.
- This advisory opinion is limited to the current provisions and interpretation of the House rules and federal statutes specifically noted above. No opinion is expressed or implied herein regarding the application of any other federal, state, or local statute, rule, regulation, ordinance, or other law that may be applicable to the proposed conduct described in this letter.
- This advisory opinion will not bind or obligate any entity other than the Committee on Ethics of the United States House of Representatives.
- This advisory opinion is limited in scope to the specific proposed conduct described in this letter, the specific facts represented to the Committee, and the understanding of those facts to the extent indicated in this letter, and does not apply to any other conduct or facts, including that which appears similar in nature or scope to that described in this letter. Should this letter misstate any facts in this matter, the opinion and advice may no longer apply and you should inform the Committee as soon as possible to determine if the advice and opinion in this letter applies to the accurate factual basis.

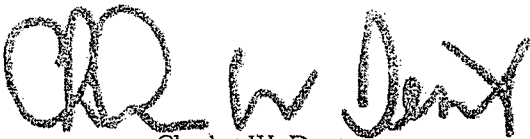
The Committee will take no adverse action against you in regard to any conduct that you undertake, or have undertaken, in good faith reliance upon this advisory opinion, so long as you have presented a complete and accurate statement of all material facts relied upon herein, and the proposed conduct in practice conforms with the information you provided, as addressed in this opinion.

Changes or other developments in the law (including, but not limited to, the Code of Official Conduct, House rules, Committee guidance, advisory opinions, statutes, regulations, or case law) may affect the analysis or conclusions drawn in this advisory opinion. The Committee reserves the right to reconsider the questions and issues raised in this advisory opinion and to rescind, modify, or terminate this opinion if required by the interests of the House. However, the Committee will rescind an advisory opinion only if relevant and material facts were not completely and accurately disclosed to the Committee at the time the opinion was issued. In the event that this advisory opinion is modified or terminated, the Committee will not take any adverse action against you with respect to any action taken in good faith reliance upon this advisory opinion so long as such conduct or such action was promptly discontinued upon notification of the modification or termination of this advisory opinion.

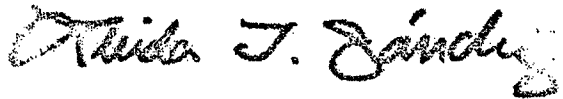
The Honorable Ryan Zinke
Page 5

If you have any further questions, please contact the Committee's Office of Advice and Education at extension 5-7103.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles W. Dent". The signature is stylized with large, bold letters.

Charles W. Dent
Chairman

A handwritten signature in black ink, appearing to read "Linda T. Sanchez". The signature is stylized with large, bold letters.

Linda T. Sanchez
Ranking Member

CWD/LTS:mmm